

BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.

-----  
2022 U.S.-SOUTH AFRICA COMBINATION : Docket DOT-OST-2022-0050  
FREQUENCY ALLOCATION PROCEEDING :  
-----

ANSWER OF  
UNITED AIRLINES, INC.

Communications with respect to this document should be sent to:

Steve Morrissey  
Vice President—Regulatory  
& Policy  
UNITED AIRLINES, INC.  
815 Connecticut Avenue, NW  
Suite 500 – DCAIZ  
Washington, DC 20006  
(202) 521-4373  
steve.morrissey@united.com

Daniel A. Weiss  
Managing Director—International  
Affairs and Regulatory  
UNITED AIRLINES, INC.  
233 South Wacker Drive, HDQIZ  
Chicago, IL 60606  
dan.weiss@united.com

May 25, 2022

James Conneely  
Associate General Counsel—  
Regulatory, Environmental,  
Facilitation and Government Affairs  
UNITED AIRLINES, INC.  
233 South Wacker Drive  
11th Floor – HDQLD  
Chicago, IL 60606  
(872) 825-8311  
james.conneely@united.com

Amna Arshad  
Benjamin Sanchez  
Freshfields Bruckhaus  
Deringer LLP  
700 13<sup>th</sup> Street, NW, 10<sup>th</sup> Floor  
Washington, D.C.  
(202) 777-4596  
amna.arshad@freshfields.com  
benjamin.sanchez@freshfields.com

Counsel for  
United Airlines, Inc

BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.

-----  
2022 U.S.-SOUTH AFRICA COMBINATION : Docket DOT-OST-2022-0050  
FREQUENCY ALLOCATION PROCEEDING :  
-----

ANSWER OF  
UNITED AIRLINES, INC.

United<sup>1</sup> submits this Answer and exhibits that follow in Attachment 1<sup>2</sup> in response to the Amendment and Supplement to the Application of Delta (“Supplement”)<sup>3</sup> for frequency allocations to South Africa pursuant to the Department’s Instituting Order.<sup>4</sup>

**INTRODUCTION**

United has put forth a thoughtful and well-supported application that demonstrates exactly the types of public benefits its Washington, D.C. – Cape Town service will generate – from providing new valuable nonstop service to the largest unserved U.S. – Cape Town city pair – to creating connecting opportunities for a significant majority of U.S. – Cape Town demand, and

---

<sup>1</sup> Common names are used for airlines.

<sup>2</sup> Supporting data and analysis in this Answer have been provided by Compass Lexecon. Data and analysis use 2019 booking data. Data from 2020 and 2021 is unreliable to predict future travel behavior, as it reflects significant travel and schedule disruptions resulting from the COVID-19 pandemic.

<sup>3</sup> See Amendment and Supplement to Application of Delta Air Lines, Inc. (“Delta’s Supplement”), Docket DOT-OST-2022-0050 (May 18, 2022).

<sup>4</sup> See DOT Order 2020-5-1, Docket DOT-OST-2022-0050 (May 4, 2022) (“Instituting Order”).

creating connections to unique, hard-to-reach destinations in southern Africa through its partnership with Airlink, among others.

Delta's application, on the other hand, reflects only a misplaced sense of entitlement to the valuable frequencies as demonstrated by the lack of support and even effort to meet the Department's minimum requirements in the Instituting Order, not to mention their numerous misstatements and exaggerations throughout their Supplement serving only to distract from any real public benefits analysis. Delta's brazen suggestion that the Department "not overthink this case" because the "math is simple" is an example of such a distraction. In fact, even a cursory review of the merits demonstrates the superior public benefits of United's proposal for new service between Washington, D.C. and Cape Town.

As the Department well knows, based on its decades of experience overseeing such proceedings, frequency allocation proceedings are rarely simple and certainly not meant to serve solely as the great equalizers for carriers. It is not the carriers, but the public, who should be the beneficiary of the Department's decision. And while competition is certainly one factor to look at, maximizing public benefit necessitates the consideration and weighing of a range of public benefits to determine which proposal offers the greatest public benefits overall.

United is confident in the Department's ability to do just this and come to the only conclusion that will maximize the benefit of valuable frequencies in this proceeding: that United's proposal will meet unmet demand to South Africa and will provide the most benefits to the consumers and communities for whom travel to South Africa matters most. United's Supplement demonstrates that the public benefits of its proposal – creating a new nonstop gateway to South Africa, adding new nonstop service on the largest unserved U.S. – Cape Town city pair, unlocking connectivity for a significant majority of U.S. – Cape Town demand as well as to beyond points –

outweigh any purported benefits of Delta's proposal<sup>5</sup> to serve the same U.S. city (Atlanta) that Delta can and already plans to serve via its existing approvals without any need for these valuable frequencies.

## **ARGUMENT**

### **I. UNITED'S PROPOSAL CREATES GREATER PUBLIC BENEFITS THAN DELTA'S**

As United demonstrated in its Supplement, Washington, D.C. – Cape Town service will generate greater public benefits than Delta's proposed Atlanta – Cape Town service. Washington, D.C. has more demand to Cape Town than any U.S. city, except New York, and it is the largest concentration of demand without nonstop service. Notably, Washington, D.C. has twice as much demand as Atlanta and the region is home to 1.5 million more residents as well as to the headquarters of 21 Fortune 500 Companies. The D.C. area has strong ties to South Africa with one of the largest South African-born populations in the United States. United's proposed service will connect the legislative capitals of the United States and South Africa, facilitating stronger connections and diplomacy between the two nations. (*See Exhibits UA-A100 and UA-A101*)

United's proposed service at Dulles will also provide connections to destinations across the United States that serve 92% of U.S. – Cape Town demand. (*See Exhibits UA-A101*) Through its partnership with Airlink, United will provide beyond Cape Town service to unique points across southern Africa, providing consumers with greater flexibility and options.

---

<sup>5</sup> United has not found any instance where the Department has considered on-time performance, customer service, or seat pitch in its consideration. The public certainly benefits from high-quality service, but United will provide this. Utilizing network-wide statistics that include a variety of hubs, aircraft, and operational environments do not indicate the level of service that will be provided on the proposed route. United has made its best efforts to honestly assess its reliability (which Delta has not) based on the specific aircraft proposed to operate the service.

Delta raises the issue that United would hold six weekly frequencies if its proposal were fully awarded by the Department as though it were a bad thing. United disagrees and provided many reasons why that level of frequency at Cape Town benefits the public. Washington, D.C. – Cape Town at three weekly frequencies, combined with Newark/New York City – Cape Town at three weekly flights, among other benefits, gives consumers better itinerary options: more days in the month to travel (nearly 90% of the month), more flight choices, and two U.S. gateways to connect through on the same airline.

United's service maximizes public benefits, and the public seems to agree. United filed over 60 letters of support from elected officials<sup>6</sup>, business development agencies, and several U.S. cities who all recognize the benefits of United's Washington, D.C. proposal. Even the air development group for Cape Town, Wesgro, which is the official voice of air service development for the city has endorsed Washington, D.C. over Atlanta.

The Washington, D.C. – Cape Town air service proposal continues to receive support from additional elected officials, business development associations, the International Association of Machinists and Aerospace Workers, the Metropolitan Washington Airports Authority, and the following additional cities that have registered their support for one-stop Cape Town service via Washington, D.C. *See Attachment 2.*

- Burlington, Vermont
- Chicago, Illinois
- Charlottesville, Virginia
- Huntsville, Alabama
- Knoxville, Tennessee
- Louisville, Kentucky
- Pittsburgh, Pennsylvania
- Roanoke, Virginia
- San Francisco, California
- Syracuse, New York

---

<sup>6</sup> Delta may, and likely will, submit similar letters of support in their Answer or Reply in this proceeding. It nevertheless remains true that they did not or were unable to demonstrate such support in their preliminary filing where carriers were asked to demonstrate "the benefits of the carrier's proposed service to the public interest." *See* Instituting Order.

## **II. RATHER THAN DEMONSTRATE A SUPERIOR PUBLIC BENEFIT, DELTA'S SUPPLEMENT MISLEADS AND MISDIRECTS**

Delta's application is filled with attempts to mislead or misdirect the Department, likely because Atlanta – Cape Town presents little public benefits for the Department to consider. Delta has chosen to mislead on even the most inconsequential aspects of its application. For example, Delta thought it appropriate to claim that its customers in the main cabin “would enjoy more seat width and more pitch between rows” than United. In reality, Delta passengers would enjoy 0.1 inches of additional seat width (a practically imperceptible difference) and only some passengers in the main cabin would enjoy more pitch, many would experience the same pitch as they would on United.<sup>7</sup> While this claim is misleading, Delta next ventures into pure fiction when claiming that Premium Select passengers will also enjoy wider seats. Yet Delta offers narrower seats – a full 0.5 inches narrower – than United in the equivalent cabin.

Nonetheless, seat pitch and width are not important considerations in ascertaining the public benefits of United and Delta's proposals, but even in these most minor of characteristics, Delta has liberally embellished its proposal. This pattern of behavior continues in Delta's false claims regarding a United monopoly, exaggerated claims of public benefits, inclusion of numerous other irrelevant considerations, and failure to comply with the Instituting Order. In short, Delta has failed to put forth an honest application that challenges what United has already demonstrated – that the United proposal will maximize the public benefit.

---

<sup>7</sup> Compare United Airlines. Boeing 787-9 Dreamliner. <https://www.united.com/ual/en/us/fly/travel/inflight/aircraft/787-9.html> and Delta Air Lines. Airbus A350-900. <https://www.delta.com/us/en/aircraft/airbus/a350>.

**A. This Frequency Application will have Limited Impact on Competition, and any Alleged Competition Arguments are Outweighed by the Public Benefits of United's Proposal**

Delta repeats a familiar refrain in this proceeding as it has in recent past route allocation proceedings<sup>8</sup> – that it is a smaller, structurally disadvantaged carrier. This is not supported by any evidence.

First, Delta invents the “nonstop U.S. – Cape Town market” in order to claim that United has a monopoly in it. They provide no support for this claim. The only nonstop service that will be created by either proposal is nonstop service between Washington D.C. – Cape Town or between Atlanta – Cape Town. All other service provided by either carrier will be connecting. Theoretically, connecting passengers could prefer U.S. point – U.S. point – Foreign point itineraries over U.S. point – Foreign point – Foreign point itineraries, but United is aware of no evidence to support this idea. Instead, the evidence suggests the opposite. In 2019, the largest carrier of U.S. – Cape Town traffic was Emirates, which connected more traffic – a 16.7% share – than any of the carriers offering nonstop U.S. – South Africa service. Behind Emirates was British Airways, a oneworld carrier, with 13.9% share and KLM/Air France, affiliated with SkyTeam, at 13.1%. In comparing the three global alliances in 2019, SkyTeam had the largest share (31.8%), followed by Star (28.2%) and then oneworld (23.0%) Connecting itineraries over third-country points served 2/3rds of the total demand between the U.S. – Cape Town. (*See* Exhibits UA-A103, UA-A104) These itineraries offered by dozens of carriers have in the past and will continue to offer significant competition on U.S. – Cape Town itineraries. United's most

---

<sup>8</sup> See 2019 U.S.-Haneda Combination Services Allocation Proceeding, Docket DOT-OST-2019-0020; *see also* 2016 U.S.-Tokyo (Haneda) Combination Services Allocation Proceeding, Docket DOT-OST-2016-0048.

significant competition comes from these carriers who are among the leading airlines in the world<sup>9</sup> and offer valuable additional services like free stopover visits in the connecting city.<sup>10</sup> Competition for U.S. – Cape Town traffic is intense, and it will continue to be regardless of the outcome of this proceeding.

Second, Delta claims that failure to award its proposal “would indefinitely cement United’s monopoly in the nonstop U.S. – Cape Town market.” Even if the “nonstop U.S. – Cape Town market” were a relevant market (it is not), United would not have a monopoly. It is astonishing that Delta would make such a claim when it has received approval from the South Africa Department of Transportation to offer nonstop Cape Town – Atlanta service and has publicly stated its plans to do so. If there were any substance to Delta’s allegation, then wouldn’t it also apply to Delta being the lead U.S. carrier in Africa for over a decade – a longstanding “nonstop U.S.-Africa monopoly.” (See Exhibit UA-A102).<sup>11</sup> Delta regularly makes these arguments to the Department and the Department regularly rejects them. For example, in the Department’s 2016 Los Angeles – Beijing proceeding, Delta similarly argued that “American dominates transpacific and international services at Los Angeles.” The Department then, as it should now, rejected this

---

<sup>9</sup> Of the largest 15 carriers serving the most U.S. – Cape Town traffic, nine are ranked in the top 30 airlines in the world by Skytrax (higher than Delta or United).

<sup>10</sup> See e.g., Turkish Airlines stopover in Istanbul. <https://www.turkishairlines.com/en-us/flights/stopover/>; Qatar Airways stopover in Doha. <https://www.qatarairways.com/en-us/offers/qatar-stopover-booking.html>.

<sup>11</sup> See Delta Earnings Calls Transcripts (emphasis added); Q2-2008 – “We’re the *largest carrier to Africa*”; Q2-2007 – “We have already announced that we will be serving Nigeria starting in the fall and *establishing ourselves as the first mover and the leader in Africa*.” “International capacity was up 15%, as we continue to capitalize on our *first [mover] advantage in new markets in Africa*, Asia and Europe”; 2007-Q4 – “The international expansion has been successful. We’ve been pleased with the revenue growth and profitability of the new international routes and we will continue to be strong across the Atlantic as we go to unique destinations in Asia, the Middle East, *and Africa. About two-thirds of the expansions that we have in 2008 are unique for US flag carriers where we don’t have other US flag carriers in those markets.*”



claim finding that “Delta could expand its international service at Los Angeles at any time.”<sup>12</sup>

Regardless, the Department must recognize Delta’s competition argument for what it is – a desperate distraction from the weakness of its proposal on the merits. As the Department has previously stated, while “competitive factors are certainly elements we consider as part of carrier selection, we also consider other factors, particularly the objective of promoting public benefits through new service options for the traveling and shipping public.”<sup>13</sup> As the Department has found in other proceedings when Delta has made similar claims about its competitive position, the numerous public benefits that will accrue from United’s proposal – i.e., restoration of service by a U.S. flag carrier to the largest currently unserved nonstop city-pair between the U.S. and Cape Town and significant connectivity benefits – outweigh any purported concerns by Delta about its competitive position.<sup>14</sup> It is only United’s proposal that offers a new service option to restore a gateway that had and lost prior service to South Africa and, contrary to what Delta contends, that service will continue to face significant competition from carriers offering connecting service. As such, the numerous benefits of United’s proposal should factor higher in the Department’s priorities in this proceeding.

Ultimately, Delta has failed to prove that the benefits of its service are superior to the benefits from United’s service. And Delta’s “most important”<sup>15</sup> argument, that its proposal is the only one that would “enhance the competitive environment” is insufficient to overcome a lack of

---

<sup>12</sup> See DOT Order 2016-11-3 at 8.

<sup>13</sup> See DOT Order to Show Cause, Order 2013-6-16 at 8 (Jun. 20, 2013), Docket DOT-OST-2013-0072.

<sup>14</sup> *Id.* at 8 (finding that despite Delta’s claims that it was at a competitive disadvantage, “from a public interest standpoint,” there were greater countervailing public benefits like the creation of a new gateway that would outweigh those concerns).

<sup>15</sup> See Delta Supplement at 1.

other consumer benefits. The Department has previously rejected similar claims from carriers complaining they were numerically or competitively disadvantaged in a route case. As it has done on many prior occasions, the Department should similarly conclude here that Delta's alleged competition concerns (which are disputed by United) are outweighed by the many benefits of United's proposal.

**B. Delta's Purported Benefits are Much Smaller than it Claims**

***1. Many destinations available from Atlanta provide little to no public benefit***

Delta's Atlanta hub is the largest in the United States and no airline in the world operates a hub of similar scale. Delta's Supplement makes several exaggerated claims about the public benefits that their mega-hub will provide. For example, Delta states that 144 points will connect to Cape Town via its Atlanta hub but apparently without giving consideration of a maximum connect time. Applying any reasonable maximum connect time would result in less connectivity than what Delta has suggested. Delta argues, without any support for its claim, that this broad connectivity generates public benefit because "Cape Town travel is highly fragmented".<sup>16</sup> In fact, demand to Cape Town is not particularly fragmented. More than 75% of U.S. demand comes from just 11 cities. Only three destinations with similar total demand have 75% of that demand concentrated in fewer U.S. cities. (See UA Exhibits A105) Moreover, these 144 points include multiple airports in the same city, making the number of communities that benefit less than 144. Delta further exaggerates their destination advantage by demonstrating it with unlabeled, intentionally misleading graphs.<sup>17</sup> This portrayal cannot hide the fact that all this connectivity via

---

<sup>16</sup> See Amendment and Supplement to Application of Delta Air Lines, Inc., Docket DOT-OST-2022-0050 (May 18, 2022) at 7.

<sup>17</sup> Only two of the graphs in Delta's exhibits appear to use a zero baseline. Instead, Exhibits like DL-201 and DL-307 show small differences as if they are much more significant.

Atlanta would serve only 5% more traffic to Cape Town than United via Dulles, the second largest O&D between Cape Town and the U.S. As United explained in its Supplement and reiterated above, the benefit of this minimal additional connectivity pales in comparison to the benefits accruing to the local traffic from Washington, D.C. and the unique connectivity to southern Africa beyond Cape Town.

**2. *Duplicative departures that extend travel time contribute little to the public benefit***

Just as Delta's over-simplified claims regarding destinations overstate the connectivity benefit to the public, the Department should be wary of Delta's spurious claims regarding its overall departures that exaggerate the public benefit that such departures would create. Delta serves many cities multiple times per day and each additional service to a connecting point offers less public benefit. Delta's 8:01pm arrival from Boston offers ideal connecting service with minimal wait time to Cape Town, but the nine flights earlier in the day from Boston to Atlanta offer nothing but longer connecting times to passengers ranging from 12 hours to two hours. (*See* UA Exhibit A106) To illustrate, when reviewing three other destinations served by Atlanta and Washington-Dulles it is again apparent that simply having more flights does not result in any tangible consumer benefits. For example, in the case of flights from Nashville to the hubs and from the hubs to Charlotte and Orlando, Delta at Atlanta indeed offers more service throughout the day than United at Washington-Dulles; however, these additional departures result in longer connecting times at Atlanta, collectively ranging from 38 hours to five hours. (*See* UA Exhibits UA-A107, UA-A108, UA-A109) The majority of Delta's departures at Atlanta are duplicative and provide marginal benefit to the public – the total number of departures by a carrier at an airport is simply not a reasonable measure of public benefit.

Delta has also, United believes, provided information for connecting flights that will not connect. Though Delta has provided this information without explanation as to the direction or

season of these connections, it appears that several of these connections do not exist. For example, Delta lists DL1362, a flight from ATL-BHM as a connecting opportunity for DL211. But DL211 only arrives in Atlanta on days 1, 4, and 6 and DL 1362 operates only on day 7. There are at least five additional examples of these false connections in the final section of connections alone.<sup>18</sup> Even if these were inadvertent oversights, there is no excuse for submitting incorrect information to the Department and it appears that nothing in Delta's application can be taken at face-value.

**3. *The A350-900 may not be able to support the capacity Delta claims***

Delta suggests that it has chosen to use its A350-900 because it is "committed to introducing the most competition possible." The truth is that the aircraft is the only one in Delta's fleet with the range to fly to South Africa and even then there is good reason to doubt that Delta will be able to fly the aircraft full. With little explanation as to the assumptions behind the claim (unlike United's seasonal, load-factor based estimates), Delta reveals that the aircraft will only be able to carry 1,000 lbs. of cargo. Per Delta<sup>19</sup>, the aircraft has space for dozens of 3,500lb cargo containers but evidently will be pushed to its operational limits on this route and not be able to carry even a single fully loaded container. While the A350-900 is not an uncommon aircraft for use on ultra-long-haul routes, Delta is unique in trying to fly more than 300 seats. The average gauge of the aircraft on routes over 8,000 miles (excluding those operated by Delta) is only 250 seats.<sup>20</sup> United does not operate widebody Airbus aircraft and thus cannot state with certainty the

---

<sup>18</sup> Delta also includes DL754 and DL5146 that only operate on day 2; DL1132 and DL2930 that only operate on day 7; and DL 1346 that only operates on day 5. *See* Amendment and Supplement to Application of Delta Air Lines, Inc., Docket DOT-OST-2022-0050 (May 18, 2022) at 74-79.

<sup>19</sup> *See* Delta Cargo. "Airbus 350-900". <https://www.deltacargo.com/Cargo/catalog/aircraft-specification/airbus-350-900>.

<sup>20</sup> Moreover, some of these aircraft are the A350-900 ULR variant with design modifications to facilitate long-haul flights. Delta does not operate this special version.

operational limits of the A350-900, but Delta has provided no support for its stated capacity and there is plenty of reason to doubt their incredibly optimistic operating assumptions.

**C. Delta Relies on Irrelevant Factors Rather than Recognized Public Benefits to Support Atlanta – Cape Town Service**

Though it is admirable that “Delta Partners with Leading Teams and Organizations in Atlanta,” its community involvement in its hometown is not evidence of a public benefit of the service it has proposed in this proceeding. United, and indeed most U.S. carriers, are heavily involved in supporting the communities they serve. Delta has not demonstrated that its activity in the community will increase, support, be enriched by, or otherwise be impacted at all by an award in this proceeding. This is because, while valuable, community involvement does not demonstrate the benefits to the public of a specific route. Community involvement is not the only irrelevant argument Delta has made in its supplemental application. Of the 30 exhibits provided by Delta, half are completely unrelated to the proposed service.<sup>21</sup> Among other extraneous topics, Delta suggests that it should be awarded this service because the Atlanta airport has biometric screening<sup>22</sup> and because Delta has been recognized as a “Best Places to Work.”<sup>23</sup> Because Delta has proposed obviously inferior service, it has filled its application with whatever arguments it can

---

<sup>21</sup> Take for consideration DL-202, DL-203, DL-301, DL-302, DL-309, DL-310, DL-402, DL-403, DL-501, DL-502, DL-503, DL-504, DL-505, DL-506, DL-507—15, or half, of the 30 exhibits, tout Delta seats, Delta aircraft interiors, Delta’s Atlanta hub, Delta service awards, Delta social programs, and Delta employee perceptions of Delta. However, none of these are factors upon which the Department is charged to make decisions on public benefits of a competitive route proceeding application.

<sup>22</sup> See Amendment and Supplement to Application of Delta Air Lines, Inc., Docket DOT-OST-2022-0050 (May 18, 2022) at Exhibit DL-309.

<sup>23</sup> *Id.* at Exhibit DL-507.

find indicating advantage over United whether or not they are related to the public benefit of these two proposed flights to Cape Town.<sup>24</sup>

Delta also highlights its sustainability initiatives, an obvious attempt to appeal to Honorable Assistant Secretary Petsonk. Yet while Delta touts its sustainability vision it casts yet another revision to its South Africa route plans – an increase to year-round service regardless of demand – as an unequivocal benefit. Few activities in aviation create more unnecessary emissions than flying one of the longest routes in the world when demand doesn't warrant it. In addition to this contradiction between Delta's plan and the portrayal of its plan, if either carrier has made more significant progress towards reducing the environmental impact of aviation, it is United. Delta recently touted its "first multi-year agreement" to purchase 300,000 gallons of sustainable aviation fuel, which it signed in July of 2021;<sup>25</sup> United's first sustainable aviation fuel agreement was signed six years prior, in 2015.<sup>26</sup> United has publicly announced SAF purchase commitments for more than twice as many gallons as all other airlines in the world combined. United has also made more significant actual progress towards a sustainable aviation future, including operating the world's first 100% sustainable aviation fueled passenger flight in December 2021;<sup>27</sup> Delta has

---

<sup>24</sup> Though these arguments are irrelevant and United does not believe they warrant argument-by-argument refutation, many of them are not even meaningful distinctions between the two carriers. For example, Delta highlights that it was a recipient of the "Crystal Cabin Award." United is also a recipient and has won the award more recently. *See Crystal Cabin Award* "Finalists and Winners." <https://www.crystal-cabin-award.com/finalists-winners/history.html>.

<sup>25</sup> *See* Delta Air Lines. "Delta signs first multi-year SAF agreement with CTM, reaches collective purchase of 300,000 gallons with corporate partners." <https://news.delta.com/delta-signs-first-multi-year-saf-agreement-ctm-reaches-collective-purchase-300000-gallons-corporate>.

<sup>26</sup> *See* Fulcrum Bioenergy, News Release. "Fulcrum Bioenergy Announces Major Investment and Strategic Partnership with United Airlines." <https://fulcrum-bioenergy.com/wp-content/uploads/2018/05/2015-06-30-Fulcrum-United-Strategic-Partnership-FINAL.pdf>.

<sup>27</sup> *See* United Airlines, Press Release. "United to Become First in Aviation History to Fly Aircraft Full of Passengers Using 100% Sustainable Fuel." <https://united.mediaroom.com/2021->

apparently signed “Memorandum of Understanding” for “research and development” but has not, so far, delivered on its plans. While ultra-long haul flights like this one present the greatest challenge to operate sustainably, United has already made more progress towards this goal and is much more likely to achieve it before Delta.

To the extent the Department considers sustainability in its public benefit determination, and because Delta raised it, United provides as Attachment 3 the airline’s climate advocacy report detailing the many firsts and industry leading initiatives United has either launched or already accomplished – far exceeding Delta’s efforts to date.

**D. Delta is Not Disadvantaged; It Already Has the Ability to Serve Cape Town and Has Publicly Stated that It Will**

Delta would have its cake and eat it too – all at the expense of the public interest. While Delta is deliberately silent on this subject in its initial Application as well as in its Supplement, it is United’s understanding based on publicly available information that Delta already has the ability and authority to operate at Cape Town<sup>28</sup> and has publicly stated its intent to extend the triangle route to Cape Town.<sup>29</sup> Delta, right now, holds the authority to operate seven weekly services at

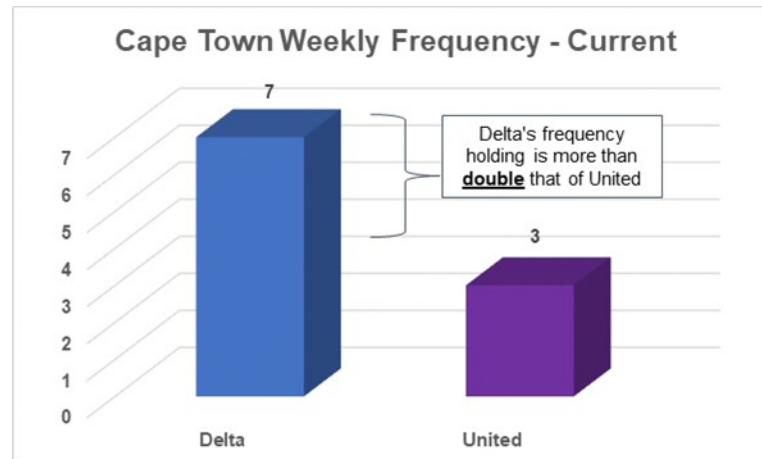
---

12-01-United-to-Become-First-in-Aviation-History-to-Fly-Aircraft-Full-of-Passengers-Using-100-Sustainable-Fuel.

<sup>28</sup> In Delta’s April 4, 2022, Application for Renewal of an Exemption ([DOT-OST-2020-0051](#)), Delta requested renewal of its exemption authority between Atlanta, Georgia and coterminal points Johannesburg and Cape Town, South Africa. Delta invoked automatic extension provisions to extend its existing authority while this application is pending. If indeed Delta requires an additional Department authority to operate at Cape Town, there are no hurdles preventing Delta from applying and receiving that authority.

<sup>29</sup> From the Points Guy: “Delta is pleased that its application to operate its triangular route from Atlanta-Johannesburg-Cape Town-Atlanta has been approved,” the spokesperson said in a statement about the recent approval by regulators. “We look forward to extending our new routing to serve South Africa later this year and offering more choice of travel between the U.S. and South Africa.” <https://thepointsguy.com/news/delta-air-lines-south-africa-triangle-route/>.

Cape Town even as it attacks United's plans to grow from three weekly frequencies to six weekly frequencies – still one fewer than what Delta is capable of operating now. (See "Cape Town Weekly Frequency – Current" chart below)



Moreover, not only does Delta hold seven weekly frequencies to use for service at Cape Town, it also has flexibility to use these frequencies in multiple ways, including:

- Nonstop service from Atlanta to Cape Town any number of days of week up to daily with a stop at Johannesburg on the return
- Nonstop service from Cape Town to Atlanta any number of days of week up to daily after a stop at Johannesburg
- Nonstop service Atlanta – Cape Town – Atlanta in any number of combinations:
  - Six weekly flights nonstop one direction and one weekly flight nonstop the other direction
  - Five weekly flights nonstop one direction and two weekly flights nonstop the other direction
  - Four weekly flights nonstop one direction and three weekly flights nonstop the other direction

In the most likely of scenarios and one where Delta maximizes nonstop flight options in each direction between Atlanta and Cape Town, it would operate no fewer than three weekly frequencies one direction and four weekly frequencies the other direction. This places Delta at no disadvantage to United coming into this proceeding.



**E. Delta Has Failed to Comply with the Department's Instituting Order**

Delta's application ignores the Department's explicit request to "state the minimum number of frequencies they would accept to institute service."<sup>30</sup> In doing so, Delta has ignored the Department's warning that full compliance with the evidence request in the Instituting Order is critical to the Department's consideration of these proposals and that non-compliance could result in elimination from consideration.<sup>31</sup> Delta's oversight is further indication that while United has carefully considered its proposal and has attempted to provide honest, thoroughly evidence-backed reasons to support its proposal, Delta's proposal lacks such effort and should be disqualified from consideration. United reiterates that its Application is for three weekly frequencies, but it is willing to accept two weekly frequencies should Delta agree and/or the Department finds the public interest is best served by awarding both routes proposed in this proceeding.

**CONCLUSION**

An award of United's proposal would accomplish the Department's principal objective to maximize public benefits in this proceeding. United's Supplemental Application provided ample evidence, repeated here, that the proposal creates significant public benefits for local travelers flying Washington, D.C. – Cape Town, serves nearly all of U.S. – Cape Town connecting traffic demand, and provides links to new points in southern Africa. United has provided clear and thoroughly explained estimates for its reliability and cargo capacity and provided evidence to support all of its public benefits claims. Delta has not. Delta has provided mostly irrelevant public benefits claims, and untrue, exaggerated statements that United has a monopoly, all the while

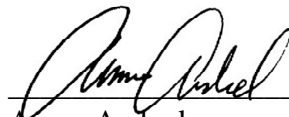
---

<sup>30</sup> Instituting Order at 4.

<sup>31</sup> *Id.*

remaining silent on its ability to already operate at Cape Town. United has thoroughly demonstrated that its proposal, unlike Delta's, will maximize the public benefit and the Department should accordingly award these frequencies to United to add new service between Washington DC and Cape Town.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Amna Arshad', is written over a horizontal line.

Amna Arshad  
Benjamin Sanchez

Freshfields Bruckhaus  
Deringer LLP

Counsel for United Airlines, Inc.

May 25, 2022

**ATTACHMENT 1**

**Before The  
Department Of Transportation**

**2022 U.S. - South Africa Combination Frequency  
Allocation Proceeding**

**DOT-OST-2022-0050**

---

**Washington, D.C. - Cape Town**

---

**United Airlines Answer Exhibits**

<b>Exhibit Number</b>	<b>2022 U.S. - South Africa Combination Frequency Allocation Proceeding</b>	<b>Number Of Pages</b>
UA-A100	Three Weekly Flights Between Washington, D.C. And Cape Town Maximize The Public Benefit Compared To Three Weekly Flights Between Atlanta and Cape Town	2
UA-A101	United's Washington, D.C. Gateway Will Connect Cape Town With 55 U.S. Cities, Totaling Over 155,000 Annual Bookings, And Accounting For 92% Of United States - Cape Town Demand	3
UA-A102	United Has Worked Diligently To Develop An African Network Against The Region's Larger Incumbent - Delta	1
UA-A103	In 2019 SkyTeam Had The Highest Share Of U.S. - Cape Town Bookings	1
UA-A104	In 2019 Delta And Other Airlines Transported More Passengers To/From Cape Town Than United	1
UA-A105	75% Plus Of U.S. - Cape Town Demand Is To/From 11 U.S. Points, Rendering Delta's Excess Connectivity At Atlanta Less Relevant	1
UA-A106	More Flights From Boston To Atlanta Only Means More Time Spent At Atlanta And Thus Less Utility For The Passenger	1
UA-A107	More Flights From Nashville To Atlanta Only Means More Time Spent At Atlanta And Thus Less Utility For The Passenger	1

<b>Exhibit Number</b>	<b>2022 U.S. - South Africa Combination Frequency Allocation Proceeding</b>	<b>Number Of Pages</b>
UA-A108	More Flights To Charlotte From Atlanta Only Means More Time Spent At Atlanta And Thus Less Utility For The Passenger	1
UA-A109	More Flights To Orlando From Atlanta Only Means More Time Spent At Atlanta And Thus Less Utility For The Passenger	1

# Three Weekly Flights Between Washington, D.C. And Cape Town Maximize The Public Benefit Compared To Three Weekly Flights Between Atlanta and Cape Town

DOT-OST-2022-0050

UA-A100

Page 1 of 2

## Washington, D.C. – Cape Town Surpasses Atlanta – Cape Town

- 8.5M people live within 60 miles of Washington Dulles compared to 6.9M in the Atlanta area
- Washington, D.C.'s South African born population ranks fifth in the U.S. compared to Atlanta at seventh
- Washington, D.C. - Cape Town is the largest unserved O&D in the U.S. with over 15,000 annual bookings. Atlanta - Cape Town bookings are less than half at 7,200
- More opportunity for U.S. business with 21 Fortune 500 Companies in Washington, D.C. area compared to 18 in Georgia



# Three Weekly Flights Between Washington, D.C. And Cape Town Maximizes The Public Benefit Compared To Three Weekly Flights Between Atlanta and Cape Town

---

DOT-OST-2022-0050

UA-A100

Page 2 of 2

## Washington, D.C. – Cape Town Surpasses Atlanta – Cape Town

- Direct air service link amongst Washington, D.C - Cape Town - Pretoria facilitates enhanced bilateral relationship between two key allies
- United hubs represent more than half of U.S. - Cape Town and U.S. - South Africa O&D traffic demand
- With United partner Airlink facilitates connections to 15 points across Southern Africa





# United's Washington, D.C. Gateway Will Connect Cape Town With 55 U.S. Cities, Totaling Over 155,000 Annual Bookings, And Accounting For 92% Of United States - Cape Town Demand

DOT-OST-2022-0050

UA-A101

Page 1 of 3

## 55 U.S. Cities With Round-Trip Connections To Cape Town Via Washington Dulles

Newark/New York	43,745	San Diego	1,441	Jacksonville	319	Albany	70
Washington, D.C.	15,218	Raleigh/Durham	1,364	Louisville	298	Burlington	69
Los Angeles	14,752	Las Vegas	1,231	Palm Beach	295	Myrtle Beach	60
San Francisco	9,050	Charlotte	1,155	Charleston	282	Hartford	58
Chicago	8,982	Tampa	1,082	San Antonio	255	Huntsville	47
Miami	8,666	Austin	1,010	Ft. Myers	224	Roanoke	44
Boston	7,660	New Orleans	790	Savannah	208	Portland	43
Atlanta	7,213	St. Louis	688	Norfolk	157	Charlottesville	30
Seattle	5,087	Nashville	680	Richmond	156	Providence	23
Houston	4,733	Indianapolis	551	Buffalo	145	Key West	14
Orlando	3,897	Cleveland	549	Rochester	137		
Dallas/Ft. Worth	3,483	Cincinnati	537	Syracuse	133		
Denver	3,153	Kansas City	525	Knoxville	116		
Detroit	2,358	Pittsburgh	450	Columbia	108		
Minneapolis/St. Paul	2,002	Columbus	394	Sarasota	87		

# United's Washington, D.C. Gateway Will Connect Cape Town With 55 U.S. Cities, Totaling Over 155,000 Annual Bookings, And Accounting For 92% Of United States - Cape Town Demand

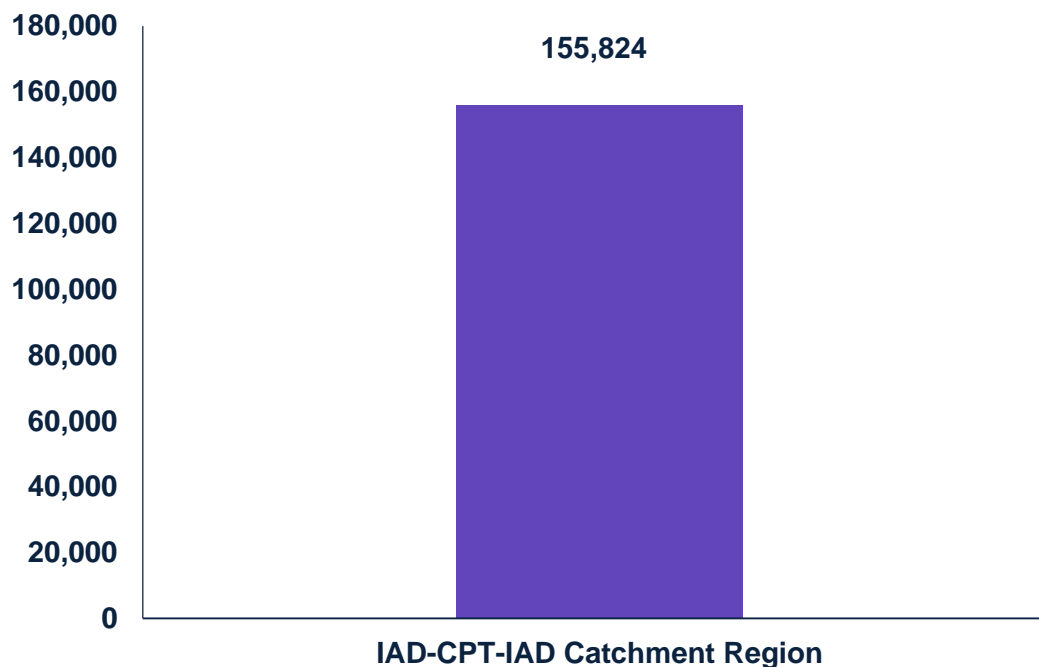
---

DOT-OST-2022-0050

UA-A101

Page 2 of 3

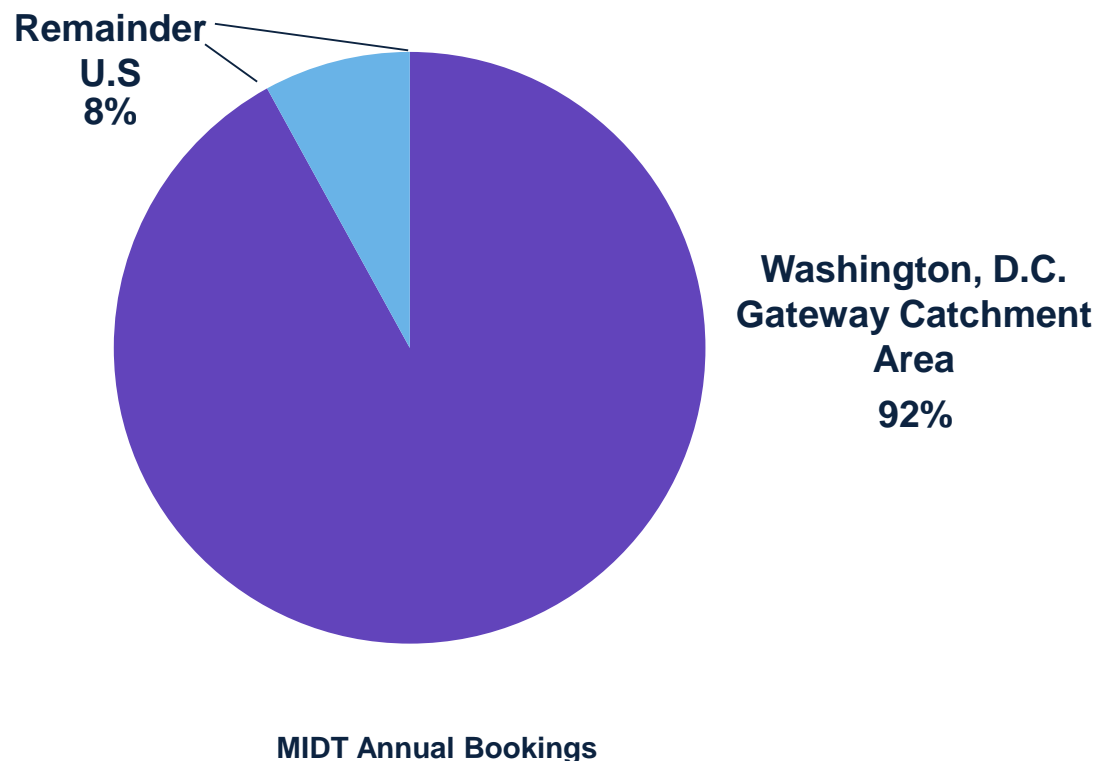
## Annual Round Trip Bookings U.S. - Cape Town



# United's Washington, D.C. Gateway Will Connect Cape Town With 55 U.S. Cities, Totaling Over 155,000 Annual Bookings, And Accounting For 92% Of United States - Cape Town Demand

---

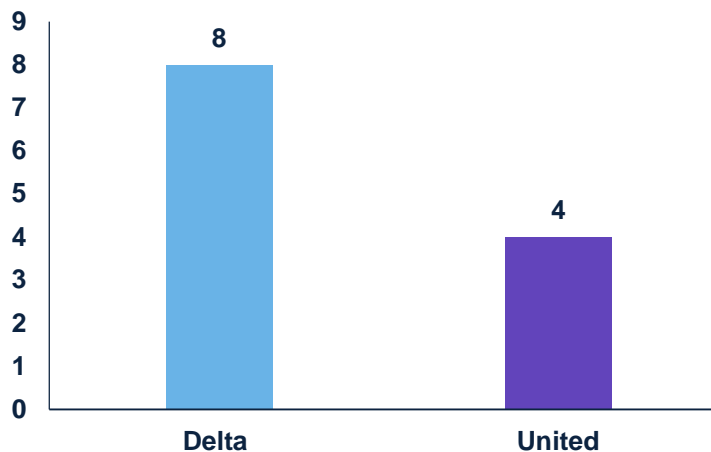
## Washington, D.C. Gateway Will Reach A Catchment Area Over 155,000 Annual Bookings Or 92% Of All U.S. - Cape Town Bookings



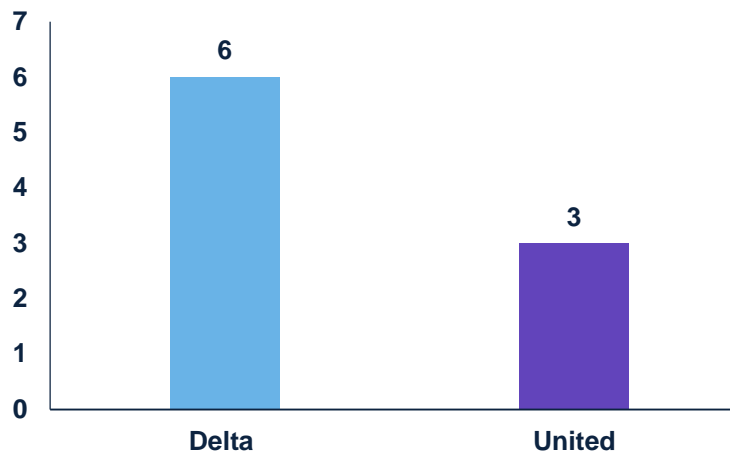
## United Has Worked Diligently To Develop An African Network Against The Region's Larger Incumbent - Delta

- United Has Invested Money And Resources To Develop An African Network
  - Delta has historically served eight cities in six countries
  - United is new regional entrant serving four cities in three countries
  - United re-entered Africa in 2019 and since then has progressively grown its network

African Continent Cities Served



African Continent Countries Served

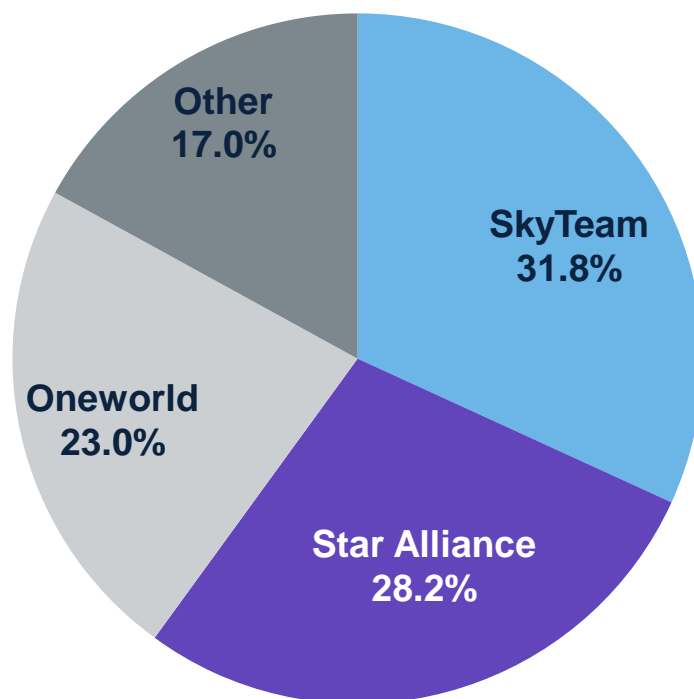


Notes: Delta has operated non-stop and/or wrap flights between New York JFK and Atlanta on the one hand and eight cities in six countries across Africa since 2006 including: Abuja, Accra, Cairo, Cape Town, Dakar, Johannesburg, Lagos, and Monrovia  
Source: OAG since 2006

## In 2019 SkyTeam Had The Highest Share Of U.S. - Cape Town Bookings

---

**Round Trip Bookings Share U.S. - Cape Town by Alliance**  
*Full Year 2019*



Notes: Data and analysis use 2019 booking data. Data from 2020 and 2021 is unreliable as it reflects significant travel and schedule disruptions resulting from the COVID-19 pandemic. United offers its booking share for January and February 2020 was 17.7%. United's Newark/New York City – Cape Town flight suspended March 2020. South African Airways, which has suspended operations to/from the U.S., had a share at 13.2% for January and February 2020

Source: MIDT full year 2019

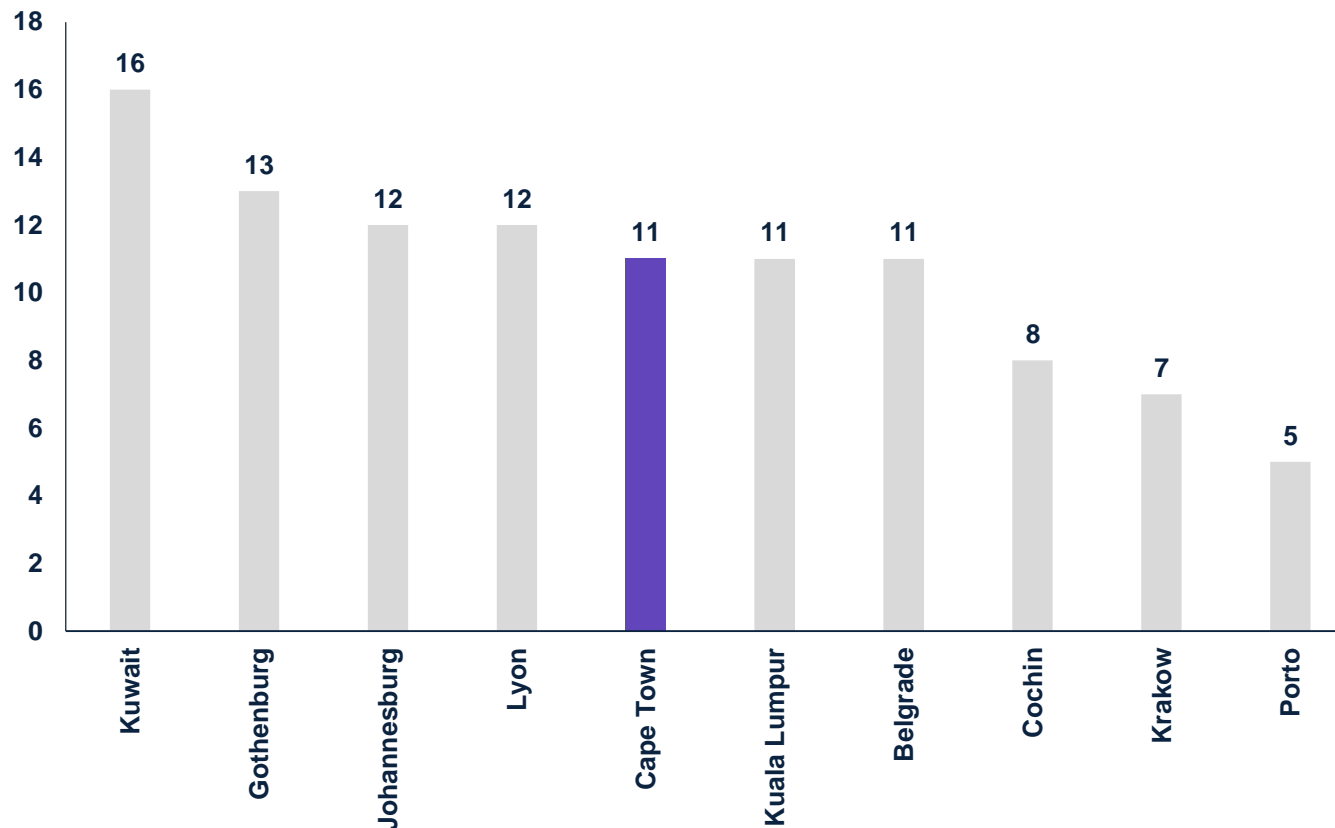
# In 2019 Delta And Other Airlines Transported More Passengers To/From Cape Town Than United

## Annual O&D Booking Share U.S. - Cape Town

<u>Carrier</u>	<u>Annual Bookings</u>	<u>Bookings Share</u>
Emirates	28,300	16.65%
Delta	27,540	16.20%
South African Airways	26,361	15.51%
British Airways	23,689	13.93%
KLM	14,737	8.67%
Qatar	8,982	5.28%
Lufthansa	8,418	4.95%
Air France	7,641	4.49%
American	5,890	3.46%
United	4,478	2.63%
Turkish Airlines	3,630	2.14%
Kenya Airways	3,071	1.81%
Ethiopian Airlines	2,347	1.38%
SWISS	1,738	1.02%
Virgin Atlantic	1,094	0.64%
Austrian Airlines	737	0.43%
Other	1,363	0.77%

## 75% Plus Of U.S. - Cape Town Demand Is To/From 11 U.S. Points, Rendering Delta's Excess Connectivity At Atlanta Less Relevant

### Number of Cities to Reach 75% of U.S. - Cape Town Demand

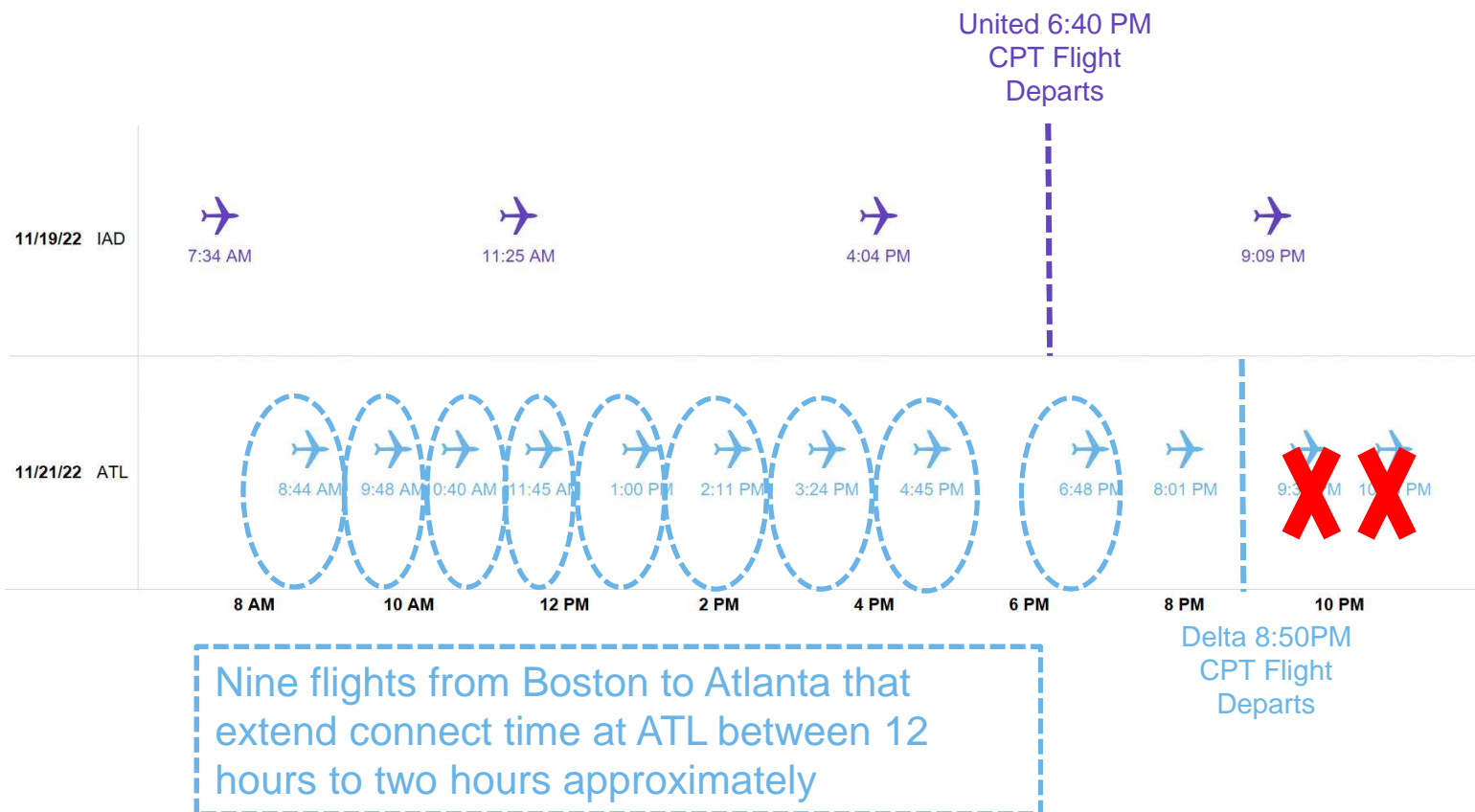


Notes: International destinations outside of the Americas with total U.S. bookings similar to Cape Town (i.e., between 160,000 and 180,000 MIDT bookings in 2019) and Johannesburg. Number of cities needed to reach or exceed 75% of U.S. – Cape Town demand

Source: MIDT full year 2019

## More Flights From Boston To Atlanta Only Means More Time Spent At Atlanta And Thus Less Utility For The Passenger

### Arrival Times At Atlanta And Washington, D.C. From Boston



- 13 Notes: Arrival times for Delta and United flights originating in Boston and arriving at IAD or ATL  
Source: November 2022 OAG as of May 5, 2022



## More Flights From Nashville To Atlanta Only Means More Time Spent At Atlanta And Thus Less Utility For The Passenger

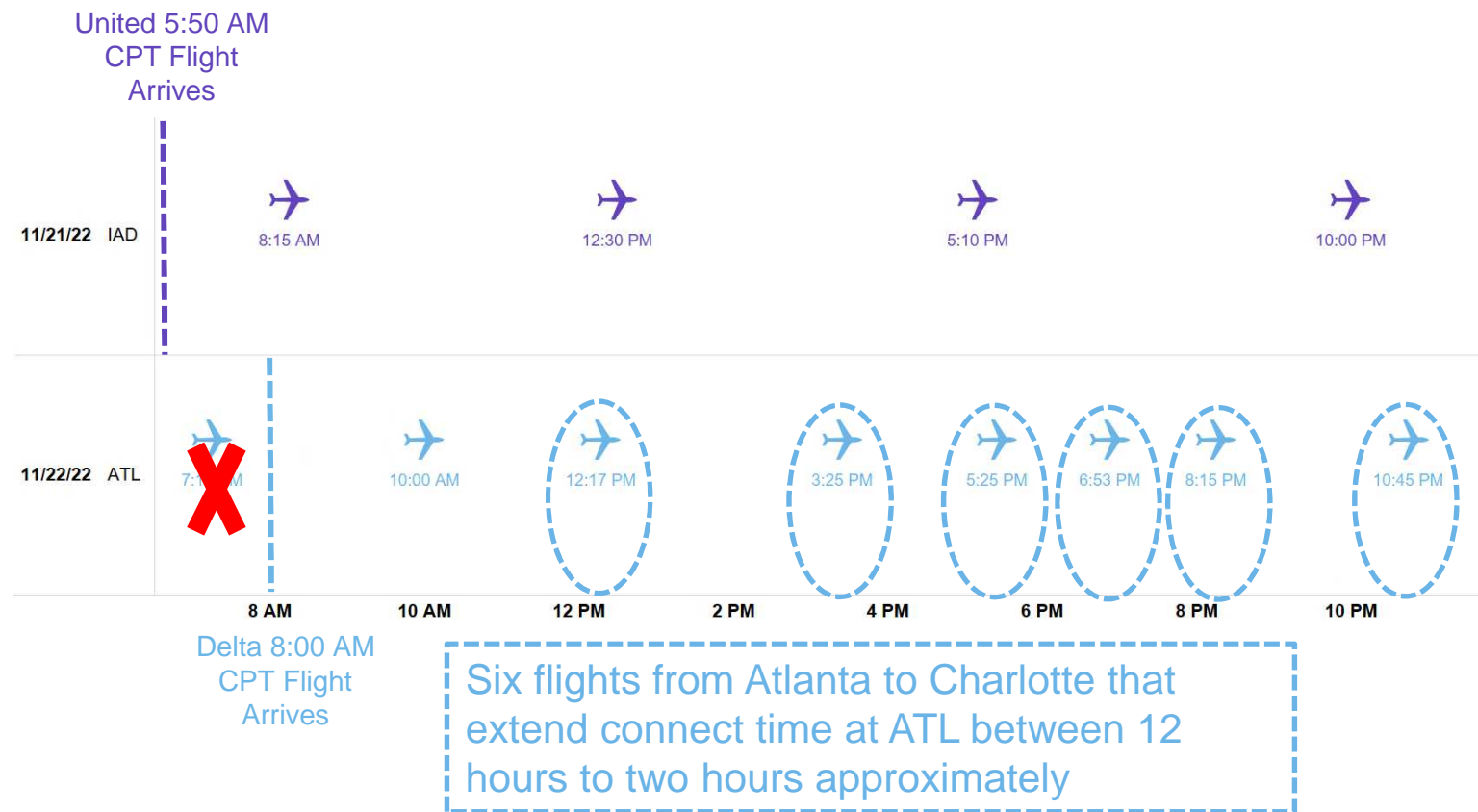
### Arrival Times At Atlanta And Washington, D.C. From Nashville



Eight flights from Nashville to Atlanta that extend connect time at ATL between 13 hours to two hours approximately

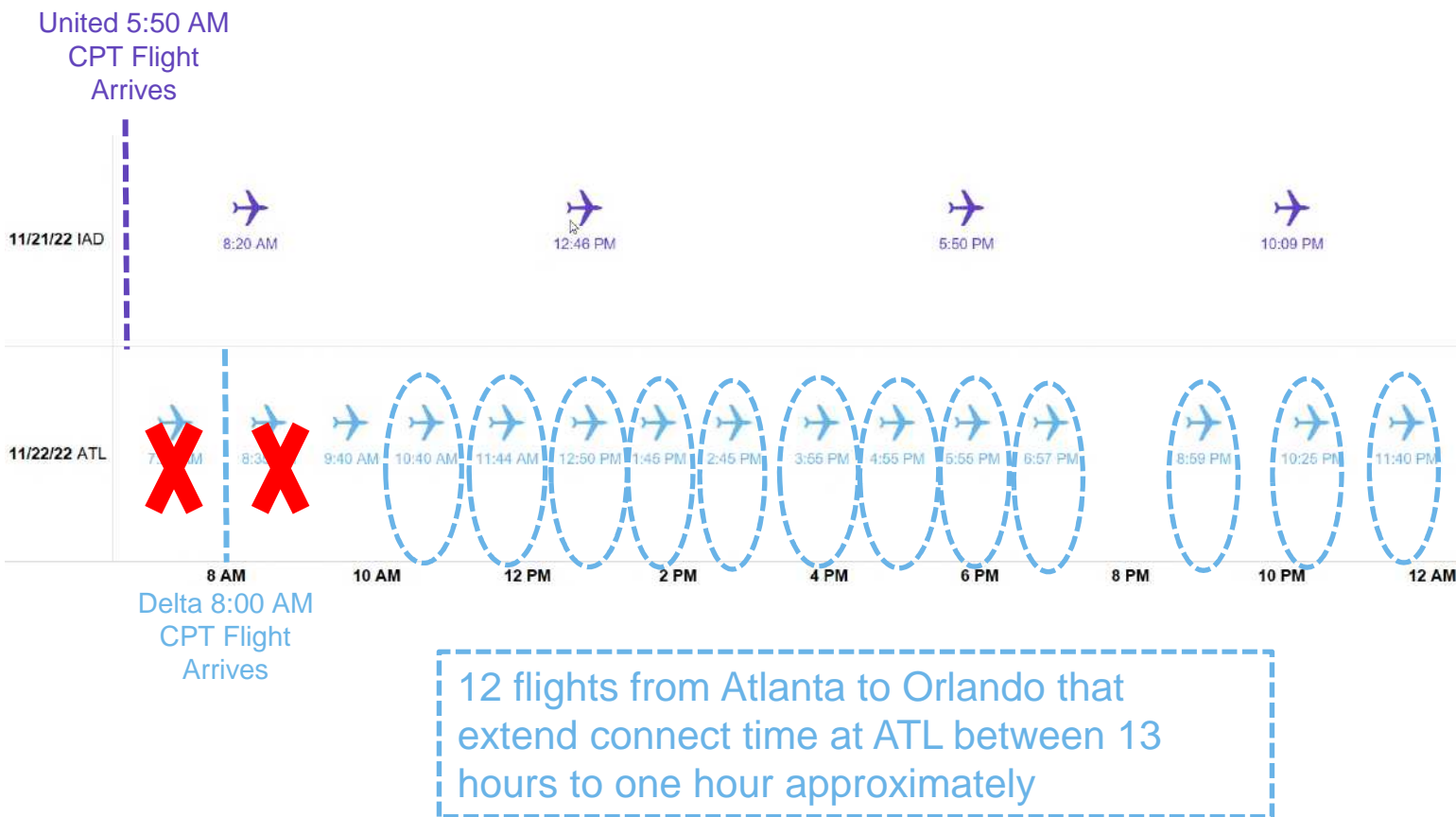
# More Flights To Charlotte From Atlanta Only Means More Time Spent At Atlanta And Thus Less Utility For The Passenger

## Departure Times At Atlanta And Washington, D.C. To Charlotte



## More Flights To Orlando From Atlanta Only Means More Time Spent At Atlanta And Thus Less Utility For The Passenger

### Departure Times At Atlanta And Washington, D.C. To Orlando



**ATTACHMENT 2**



COMMONWEALTH OF VIRGINIA  
HOUSE OF DELEGATES  
RICHMOND

ELIZABETH BENNETT-PARKER  
107 S. WEST STREET #152  
ALEXANDRIA, VIRGINIA 22314

FORTY-FIFTH DISTRICT

COMMITTEE ASSIGNMENTS:  
FINANCE  
COUNTIES, CITIES AND TOWNS

May 4, 2022

The Honorable Peter Buttigieg  
Secretary  
United States Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

Re: Docket DOT-OST-2022-0050

Dear Secretary Buttigieg,

I write today in strong support for United Airlines' application to the U.S. Department of Transportation (Department) to launch the first-ever U.S. carrier nonstop service between Washington, D.C. and Cape Town, South Africa. United proposes to connect the legislative capitals of each country with three weekly flights, providing important government, business, and cultural travel ties that no other proposal in this proceeding can match.

While your Department reviews proposals for the remaining South Africa frequencies, I urge you to consider the various groups of travelers, communities, businesses, and government bodies that stand to benefit most. In this regard, I have no doubt that the public benefits of Washington, D.C., and the connections to other cities across the U.S. that the Dulles hub offers, far surpass what Atlanta (as proposed by Delta) can offer across these same metrics. For consideration:

- **Market Demand:** As measured by annual bookings, the Washington, D.C. - Cape Town route is the largest route between the U.S. and Cape Town that does not currently have nonstop service and is more than double the size of the Atlanta - Cape Town route
- **Strong Local Community Ties:** The Washington, D.C./Virginia/Maryland region has strong cultural ties to South Africa with a South African foreign-born population that ranks in the U.S. top five and is larger than Atlanta
- **Market Size and Community Access:** United's flights between Dulles and Cape Town will connect 55 cities across the United States to Cape Town, which represent over 155,000 annual bookings and 92% of the entire U.S. travel demand to Cape Town
- **Increased Capacity and More Choice:** Because United currently operates between Newark/New York City and Cape Town on different days of the week than the Washington, D.C. - Cape Town flights would operate, flights from Washington, D.C. will provide the country nearly daily service to Cape Town offered online by a single carrier – United – which means more day-of-week flight choices, more itinerary choices, more pricing choices, and more product choices by United for consumers

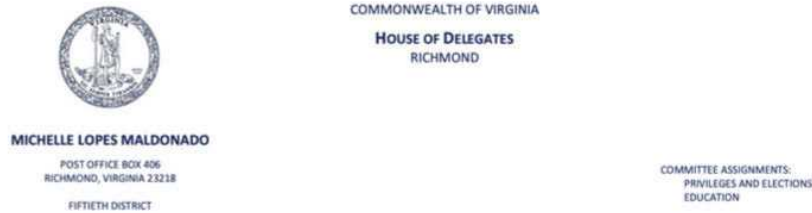
- Broader Reach: United partners with an airline that has a hub operation at Cape Town, therefore United customers will be able to connect at Cape Town to other points in South Africa and to other countries in the southern region of the African continent.

Based upon the many benefits of a flight from Washington, D.C. to Cape Town, I fully support this proposal by United Airlines.

Sincerely,

A handwritten signature in black ink that reads "Elizabeth Bennett-Parker". The signature is written in a cursive, flowing style.

Elizabeth Bennett-Parker  
Delegate  
Virginia's 45th District



May 4, 2022

The Honorable Peter Buttigieg  
Secretary  
United States Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

Re: Docket DOT-OST-2022-0050

Dear Secretary Buttigieg,

I write today in strong support for United Airlines' application to the U.S. Department of Transportation (Department) to launch the first-ever U.S. carrier nonstop service between Washington, D.C. and Cape Town, South Africa. United proposes to connect the legislative capitals of each country with three weekly flights, providing important government, business, and cultural travel ties that no other proposal in this proceeding can match.

While your Department reviews proposals for the remaining South Africa frequencies, I urge you to consider the various groups of travelers, communities, businesses, and government bodies that stand to benefit most. In this regard, I have no doubt that the public benefits of Washington, D.C., and the connections to other cities across the U.S. that the Dulles hub offers, far surpass what Atlanta (as proposed by Delta) can offer across these same metrics. For consideration:

- **Market Demand:** As measured by annual bookings, the Washington, D.C. - Cape Town route is the largest route between the U.S. and Cape Town that does not currently have nonstop service and is more than double the size of the Atlanta - Cape Town route
- **Strong Local Community Ties:** The Washington, D.C./Virginia/Maryland region has strong cultural ties to South Africa with a South African foreign-born population that ranks in the U.S. top five and is larger than Atlanta
- **Market Size and Community Access:** United's flights between Dulles and Cape Town will connect 55 cities across the United States to Cape Town, which represent over 155,000 annual bookings and 92% of the entire U.S. travel demand to Cape Town
- **Increased Capacity and More Choice:** Because United currently operates between Newark/New York City and Cape Town on different days of the week than the Washington, D.C. - Cape Town flights would operate, flights from Washington, D.C. will provide the country nearly daily service to Cape Town offered online by a single carrier – United – which means more day-of-week flight choices, more itinerary choices, more pricing choices, and more product choices by United for consumers
- **Broader Reach:** United partners with an airline that has a hub operation at Cape Town, therefore United customers will be able to connect at Cape Town to other points in South Africa and to other countries in the southern region of the African continent.



MICHELLE LOPES MALDONADO

POST OFFICE BOX 406  
RICHMOND, VIRGINIA 23218

FIFTIETH DISTRICT

COMMONWEALTH OF VIRGINIA

HOUSE OF DELEGATES  
RICHMOND

COMMITTEE ASSIGNMENTS:  
PRIVILEGES AND ELECTIONS  
EDUCATION

Based upon the many benefits of a flight from Washington, D.C. to Cape Town, I fully support this proposal by United Airlines.

Sincerely,

A handwritten signature in cursive script that reads "Michelle Lopes Maldonado".





COMMONWEALTH OF VIRGINIA

HOUSE OF DELEGATES  
RICHMOND

BRIANA D. SEWELL

P.O. BOX 1849  
WOODBRIIDGE, VIRGINIA 22195

FIFTY-FIRST DISTRICT

COMMITTEE ASSIGNMENTS:

EDUCATION  
COUNTIES, CITIES AND TOWNS  
COMMUNICATIONS, TECHNOLOGY  
AND INNOVATION

May 24, 2022

The Honorable Peter Buttigieg  
Secretary  
United States Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

Re: Docket DOT-OST-2022-0050

Dear Secretary Buttigieg,

I write today in strong support of United Airlines' application to the U.S. Department of Transportation (Department) to launch the first-ever nonstop U.S. carrier service between Washington, D.C. and Cape Town, South Africa. United proposes to connect the legislative capitals of each country with three weekly flights – providing important government, business, and cultural travel ties that will benefit our region tremendously.

I urge you to consider the various groups of travelers, communities, businesses, and government bodies that stand to benefit most from a nonstop carrier service from Washington, D.C. to Cape Town. In this regard, I have no doubt that the public benefits of Washington, D.C., and the connections to other cities across the U.S. that the Dulles hub offers, far surpass what any other major airport region can offer across these same metrics. For consideration:

- **Market Demand:** As measured by annual bookings, the Washington, D.C. - Cape Town route is the largest route between the U.S. and Cape Town that does not currently have nonstop service.
- **Strong Local Community Ties:** The Washington, D.C./Virginia/Maryland region has strong cultural ties to South Africa with a South African foreign-born population that ranks in the U.S. top five.
- **Market Size and Community Access:** United's flights between Dulles and Cape Town will connect 55 cities across the United States to Cape Town, which represent over 155,000 annual bookings and 92% of the entire U.S. travel demand to Cape Town.
- **Increased Capacity and More Choice:** Because United currently operates between Newark/New York City and Cape Town on different days of the week than the Washington, D.C. - Cape Town flights would operate, flights from Washington, D.C. will provide the country nearly daily service to Cape Town offered online by a single carrier – United – which means more day-of-week flexible flight choices, more itinerary choices, and more pricing choices.

- **Broader Reach:** United partners with an airline that has a hub operation at Cape Town. Therefore, United customers will be able to connect at Cape Town to other points in South Africa and to other countries in the southern region of the African continent.

Based upon the many benefits of a flight from Washington, D.C. to Cape Town, I fully support this proposal by United Airlines.

Sincerely,

A handwritten signature in black ink that reads "Briana Sewell". The signature is written in a cursive, flowing style.

Delegate Briana D. Sewell



**Mark D. Sickles**

PO BOX 10628  
Franconia, VA 22310

Forty-Third District

COMMONWEALTH OF VIRGINIA

**HOUSE OF DELEGATES**  
RICHMOND

COMMITTEE ASSIGNMENTS:  
Privileges and Elections  
Appropriations  
Health, Welfare and Institutions  
Rules

May 11, 2022

The Honorable Peter Buttigieg  
Secretary  
United States Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

Re: Docket DOT-OST-2022-0050

Dear Secretary Buttigieg,

I write today in strong support for United Airlines' application to the U.S. Department of Transportation (Department) to launch the first-ever U.S. carrier nonstop service between Washington, D.C. and Cape Town, South Africa. United proposes to connect the legislative capitals of each country with three weekly flights, providing important government, business, and cultural travel ties that no other proposal in this proceeding can match.

While your Department reviews proposals for the remaining South Africa frequencies, I urge you to consider the various groups of travelers, communities, businesses, and government bodies that stand to benefit most. In this regard, I have no doubt that the public benefits of Washington, D.C., and the connections to other cities across the U.S. that the Dulles hub offers, far surpass what Atlanta (as proposed by Delta) can offer across these same metrics. For consideration:

- **Market Demand:** As measured by annual bookings, the Washington, D.C. - Cape Town route is the largest route between the U.S. and Cape Town that does not currently have nonstop service and is more than double the size of the Atlanta - Cape Town route
- **Strong Local Community Ties:** The Washington, D.C./Virginia/Maryland region has strong cultural ties to South Africa with a South African foreign-born population that ranks in the U.S. top five and is larger than Atlanta
- **Market Size and Community Access:** United's flights between Dulles and Cape Town will connect 55 cities across the United States to Cape Town, which represent over 155,000 annual bookings and 92% of the entire U.S. travel demand to Cape Town
- **Increased Capacity and More Choice:** Because United currently operates between Newark/New York City and Cape Town on different days of the week than the Washington, D.C. - Cape Town flights would operate, flights from Washington, D.C. will provide the country nearly daily service to Cape Town offered online by a single carrier – United – which means more day-of-week flight choices, more itinerary choices, more pricing choices, and more product choices by United for consumers
- **Broader Reach:** United partners with an airline that has a hub operation at Cape Town, therefore United customers will be able to connect at Cape Town to other points in South Africa and to other countries in the southern region of the African continent.

Based upon the many benefits of a flight from Washington, D.C. to Cape Town, I fully support this proposal by United Airlines.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark D. Sickles". The signature is written in a cursive, flowing style.

Mark D. Sickles



May 18, 2022

The Honorable Peter Buttigieg  
Secretary  
United States Department of Transportation 1200  
New Jersey Avenue, S.E.  
Washington, D.C. 20590

Re: Docket DOT-OST-2022-0050

Dear Secretary Buttigieg,

I write to express my strong support for United Airlines' application to the U.S. Department of Transportation (Department) to launch direct service between Washington, D.C. and Cape Town, South Africa. United will be the first carrier to provide direct service connecting the legislative capitals of each country with three weekly flights. The proposed weekly flights will provide essential government, business, and cultural travel ties that no other proposal in this proceeding can match.

As your Department reviews proposals for the remaining South Africa frequencies, I urge you to consider the various groups of travelers, communities, businesses, and government bodies that stand to benefit most. As Chair at Large of Prince William County, the tenth most diverse county in the nation and most diverse in the Commonwealth of Virginia, the public benefit to Prince William County and the National Capital Region are without question. Specifically, the benefits the Dulles hub offers, far surpass what Atlanta (as proposed by Delta) can offer across these same metrics. Below, please find a list of pointed examples.

- **Market Demand:** As measured by annual bookings, the Washington, D.C. - Cape Town route is the largest route between the U.S. and Cape Town that does not currently have nonstop service and is more than double the size of the Atlanta - Cape Town route
- **Strong Local Community Ties:** The Washington, D.C./Virginia/Maryland region has strong cultural ties to South Africa with a South African foreign-born population that ranks in the U.S. top five and is larger than Atlanta

- **Market Size and Community Access:** United's flights between Dulles and Cape Town will connect 55 cities across the United States to Cape Town, which represents over 155,000 annual bookings and 92% of the entire U.S. travel demand to Cape Town
- **Increased Capacity and More Choice:** Because United currently operates between Newark/New York City and Cape Town on different days of the week than the Washington, D.C. - Cape Town flights would operate, flights from Washington, D.C. will provide the country nearly daily service to Cape Town offered online by a single carrier – United – which means more day-of-week flight choices, more itinerary choices, more pricing choices, and more product choices by United for consumers
- **Broader Reach:** United partners with an airline that has a hub operation in Cape Town, therefore United customers will be able to connect at Cape Town to other points in South Africa and neighboring countries in the southern region of the African continent.

Once again, I fully support the proposal by United Airlines for a direct flight from Washington, D.C. to Cape Town, South Africa. Thank you in advance for considering this letter as you and your dedicated staff review applications.

Sincerely,

A handwritten signature in cursive script, appearing to read "A. Wheeler".



The Wrigley Building  
410 North Michigan Avenue, Suite 900  
Chicago, IL 60611  
[www.chicagolandchamber.org](http://www.chicagolandchamber.org)

May 17, 2022

The Honorable Peter Buttigieg  
Secretary  
United States Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

Re: Docket DOT-OST-2022-0050

Dear Secretary Buttigieg:

On behalf of the over 1,000 businesses that make up the Chicagoland Chamber of Commerce, I write today in strong support for United Airlines' application to the U.S. Department of Transportation to launch nonstop service between Washington, D.C. and Cape Town, South Africa.

Today, Chicago businesses and residents have single-connect service to Cape Town three times per week via United's Newark-Cape Town operation. United's proposal in this proceeding to add service between Washington Dulles and Cape Town on three different days of the week will give travelers in Chicago a total of six days per week to fly United to/from Cape Town.

What this service expansion project will mean is more choice and greater opportunity, something that was diminished due to Covid-19 and is only gradually coming back. The project will enable consumers to have more United flights to choose from, more itinerary options, more pricing options, and the ability to tailor their travels to and from Cape Town via two different United gateways.

United is a relatively new entrant in the U.S. – South Africa market, however, there is no doubt that the airline is capable of effectively taking on this service expansion. United has been successful at operating to other points in Africa from Washington Dulles including Ghana and Nigeria. Therefore, we strongly believe the robust local base of traffic in Washington, D.C., and the large demand from cities across the U.S. for travel to South Africa, will help ensure the success of United's growth plans.

In total, United's proposal will connect 55 U.S. cities to Cape Town—facilitating tourism, business, and government-related travel—all essential to securing a strong and resounding economic recovery as our region and country continue to move into the endemic stage of the COVID-19 pandemic. Chicago residents, workers, and businesses, including the many diverse industry leaders that makeup the Chicagoland Chamber of Commerce, stand to greatly benefit from this proposal. And for these reasons, I respectfully urge you to select United.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Lavin". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jack Lavin  
President & CEO  
Chicagoland Chamber of Commerce



[www.ilchamber.org](http://www.ilchamber.org)



**Capital City Office**

215 E. Adams Street | Springfield, IL 62701 | 217-522-5512

**Chicago Office**

70 West Madison, Suite 200 | Chicago, IL 60602 | 312-983-7100

May 17, 2022

The Honorable Peter Buttigieg  
Secretary  
United States Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

Re: Docket DOT-OST-2022-0050

Dear Secretary Buttigieg,

I write today in strong support for United Airlines' application to the U.S. Department of Transportation to launch nonstop service between Washington, D.C. and Cape Town, South Africa.

Today, my community has single connect service to Cape Town three times per week via United's Newark – Cape Town operation. United's proposal in this proceeding to add service between Washington Dulles and Cape Town on three different days of the week will give travelers in my city a total of six days per week to fly United to/from Cape Town.

As you know, United already has extensive service between Chicago and Washington. As home to the nation's sixth leading state in exports, and ready access to some of the nations most dynamic businesses looking to increase global commerce ties, Chicago's access to Cape Town will be a boon not just to Illinois, but to much of the Midwest.

This means consumers in my area will have more United flights to choose from, more itinerary options, more pricing options, and the ability to tailor their travels to/from Cape Town via two different United gateways.

United is a relatively new entrant in the U.S. – South Africa market and we support its plan to increase flights to this part of the world. United has been successful at operating to other points in Africa from Washington Dulles including Ghana and Nigeria. We believe the strong local base of traffic in Washington, D.C., and the large demand from cities across the U.S. for travel to South Africa will help ensure the success of United's growth plans.

In total, United's proposal will connect 55 U.S. cities to Cape Town facilitating tourism, business, and government related travel. My community, Chicago, and the Midwest stands to benefit from this proposal, and I urge you to select United.

Sincerely,

Todd Maisch  
President and CEO



[www.ima-net.org](http://www.ima-net.org)

1301 West 22nd Street • Suite 307 • Oak Brook, Illinois 60523 • (630) 368-5300 • Fax: (630) 218-7467  
220 East Adams Street • Springfield, Illinois 62701 • (217) 522-1240 • Fax: (217) 525-0055

Email: [ima@ima-net.org](mailto:ima@ima-net.org)

May 17, 2022

The Honorable Peter Buttigieg  
Secretary  
United States Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

Re: Docket DOT-OST-2022-0050

Dear Secretary Buttigieg:

On behalf of the Illinois Manufacturers' Association (IMA) and our nearly 4,000 member companies and facilities, I write today in strong support for United Airlines' application to the U.S. Department of Transportation to launch nonstop service between Washington, D.C. and Cape Town, South Africa.

Illinois manufacturers employ more than 560,000 women and men on factory floors that contribute the single largest share of our state economy. It is critical that we have a strong and robust transportation system to move people and product around the globe. Illinois is the nation's 6<sup>th</sup> largest exporter and the third largest agricultural exporter and South Africa is our state's 14<sup>th</sup> largest trading partner.

Currently, Illinois has single connect service to Cape Town three times per week via United's Newark – Cape Town operation. United's proposal in this proceeding to add service between Washington Dulles and Cape Town on three different days of the week will give travelers in Chicago and Illinois a total of six days per week to fly United to/from Cape Town.

This means consumers in my area will have more United flights to choose from, more itinerary options, more pricing options, and the ability to tailor their travels to/from Cape Town via two different United gateways.

United is a relatively new entrant in the U.S. – South Africa market and we support its plan to increase flights to this part of the world. United has been successful at operating to other points in Africa from Washington Dulles including Ghana and Nigeria. We believe the strong local base of traffic in Washington, D.C., and the large demand from cities across the U.S. for travel to South Africa will help ensure the success of United's growth plans.

In total, United's proposal will connect 55 U.S. cities to Cape Town facilitating tourism, business, and government related travel. Businesses across Illinois stand to benefit from this proposal and I urge you to select United.

Sincerely,

A blue ink signature of Mark Denzler.

Mark Denzler  
President & CEO

**BOLDLY MOVING MAKERS FORWARD**

Metropolitan Washington  
Airports Authority  
1 Aviation Circle  
Washington, DC 20001-6000

May 18, 2022



The Honorable Peter Buttigieg  
Secretary  
United States Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, DC 20590

RE: Docket DOT-OST-2022-0050

Dear Secretary Buttigieg:

I write today in strong support for United Airlines' application to the U.S. Department of Transportation (Department) to launch the first-ever U.S. carrier nonstop service between Washington, D.C., and Cape Town, South Africa. United proposes to connect the legislative capitals of each country with three weekly flights, providing important government, business, and cultural travel ties that no other proposal in this proceeding can match.

While your Department reviews proposals for the remaining South Africa frequencies, I urge you to consider the various groups of travelers, communities, businesses, and government bodies that stand to benefit most. In this regard, I have no doubt that the public benefits of Washington, D.C., and the connections to other cities across the U.S. that the Dulles hub offers, far surpass what Atlanta (as proposed by Delta) can offer across these same metrics. For consideration:

- **Market Demand** - As measured by annual bookings, the Washington, D.C.-Cape Town route is the largest demand passenger market between the U.S. and Cape Town that does not currently have nonstop service and is more than double the size of the Atlanta-Cape Town route.
- **Economic Impact** - Currently, the Washington, D.C.-Cape Town route produces over \$73.8 million in local economic impact and over \$2.7 million in tax revenue.
- **Strong Local Community Ties**: The Washington, D.C./Virginia/Maryland region has strong cultural ties to South Africa with a South African foreign-born population that ranks in the U.S. top five and is larger than Atlanta's.
- **Market Size and Community Access** - United's flights between Dulles and Cape Town will connect 55 cities across the U.S. to Cape Town, which represent over 155,000 annual bookings and 92 percent of the entire U.S. travel demand to Cape Town.



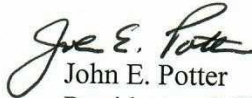


The Honorable Peter Buttigieg  
United States Department of Transportation  
Page 2

- Increased Capacity and More Choice - Because United currently operates between Newark/New York City and Cape Town on different days of the week than Washington, D.C.-Cape Town flights would operate, flights from Washington, D.C. will provide more choices for consumers.
- Broader Reach - United partners with Airlink, which has a hub operation at Cape Town. Therefore, United customers will be able to connect at Cape Town to other points in South Africa and to other countries in the southern region of the African continent.

Based upon the many benefits of a flight from Washington, D.C to Cape Town, I fully support this proposal by United Airlines and urge your approval.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Potter".

John E. Potter  
President and Chief Executive Officer

JEP:cd



MAYOR LORI E. LIGHTFOOT, CHAIR  
MELLODY HOBSON, VICE CHAIR  
MICHAEL FASSNACHT, PRESIDENT & CEO

May 17, 2022

The Honorable Peter Buttigieg  
Secretary  
United States Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

Re: Docket DOT-OST-2022-0050

Dear Secretary Buttigieg,

I write today in strong support for United Airlines' application to the U.S. Department of Transportation to launch nonstop service between Washington, D.C. and Cape Town, South Africa.

Today, my community has single connect service to Cape Town three times per week via United's Newark – Cape Town operation. United's proposal in this proceeding to add service between Washington Dulles and Cape Town on three different days of the week will give travelers in my city a total of six days per week to fly United to/from Cape Town.

This means consumers in Chicago and the surrounding areas will have more United flights to choose from, more itinerary options, more pricing options, and the ability to tailor their travels to/from Cape Town via two different United gateways.

United is a relatively new entrant in the U.S. – South Africa market and we support its plan to increase flights to this part of the world. United has been successful at operating to other points in Africa from Washington Dulles including Ghana and Nigeria. We believe the strong local base of traffic in Washington, D.C., and the large demand from cities across the U.S. for travel to South Africa will help ensure the success of United's growth plans.

In total, United's proposal will connect 55 U.S. cities to Cape Town facilitating tourism, business, and government related travel.



MAYOR LORI E. LIGHTFOOT, CHAIR  
MELLODY HOBSON, VICE CHAIR  
MICHAEL FASSNACHT, PRESIDENT & CEO

World Business Chicago support businesses and promotes Chicago as a leading global city, and Chicago stands to benefit from this proposal. I urge you to select United.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Fassnacht", written over a light gray rectangular background.

Michael Fassnacht  
President and CEO  
World Business Chicago

**International  
Association of  
Machinists and  
Aerospace Workers**



9000 Machinists Place  
Upper Marlboro, Maryland 20772-2687

Area Code 301  
967-4500



OFFICE OF THE INTERNATIONAL PRESIDENT

May 19, 2022

The Honorable Peter Buttigieg  
Secretary  
United States Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

Re: Docket DOT-OST-2022-0050

Dear Secretary Buttigieg,

On behalf of the 600,000-member International Association of Machinists and Aerospace Workers (IAM), the largest airline and transportation union in North America, I respectfully urge strong consideration and approval of United Airlines Inc., application for international flights from Dulles International Airport (IAD) to Cape Town, South Africa.

United's proposal for consistent and reliable flights between the two destinations will greatly benefit the Washington, DC metro region and beyond.

United Airlines proposes to connect the legislative capitals of each country with three weekly flights, providing important government, business, and cultural travel ties that no other proposal by competing airlines can match.

In addition, this proposed United Airlines route will be serviced by hard-working men and women who are represented by the IAM. This new flight route would benefit the local economy and provide the strong union jobs that the Biden administration has promised to protect.

Sincerely,

Robert Martinez Jr.  
International President



## BURLINGTON INTERNATIONAL AIRPORT

---

May 23, 2022

The Honorable Peter Buttigieg  
Secretary  
United States Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590  
Re: Docket DOT-OST-2022-0050

Dear Secretary Buttigieg,

I write today in strong support for United Airlines' application to the U.S. Department of Transportation to launch nonstop service between Washington, D.C. and Cape Town, South Africa. Today, my community has single connect service to Cape Town three times per week via United's Newark – Cape Town operation. United's proposal in this proceeding to add service between Washington Dulles and Cape Town on three different days of the week will give travelers in my city a total of six days per week to fly United to/from Cape Town. This means consumers in the Northeast and Quebec will have more United flights to choose from, more itinerary options, more pricing options, and the ability to tailor their travels to/from Cape Town via two different United gateways.

United is a relatively new entrant in the U.S. – South Africa market and we support its plan to increase flights to this part of the world. United has been successful at operating to other points in Africa from Washington Dulles including Ghana and Nigeria. We believe the strong local base of traffic in Washington, D.C., and the large demand from cities across the U.S. for travel to South Africa will help ensure the success of United's growth plans.

In total, United's proposal will connect 55 U.S. cities to Cape Town facilitating tourism, business, and government related travel. The State of Vermont and the surrounding Northeast region, stands to benefit from this proposal and I urge you to select United.

Sincerely,

A handwritten signature in blue ink, appearing to read "Nic Longo", is written over a circular blue stamp. The stamp contains the text "Nic Longo" and "Acting Director of Aviation" in a circular arrangement.

Nic Longo  
Acting Director of Aviation  
Burlington International Airport  
nlongo@btv.aero





May 23, 2022

The Honorable Peter Buttigieg  
Secretary  
United States Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

Re: Docket DOT-OST-2022-0050

Dear Secretary Buttigieg,

I am writing today in strong support for United Airlines' application to the U.S. Department of Transportation to launch nonstop service between Washington, D.C. and Cape Town, South Africa. Today, my community has single connect service to Cape Town three times per week via United's Newark – Cape Town operation. United's proposal in this proceeding to add service between Washington Dulles and Cape Town on three different days of the week will give travelers in my city a total of six days per week to fly United to/from Cape Town. This means consumers in my area will have more United flights to choose from, more itinerary options, more pricing options, and the ability to tailor their travels to/from Cape Town via two different United gateways.

United is a relatively new entrant in the U.S. – South Africa market and we support its plan to increase flights to this part of the world. United has been successful at operating to other points in Africa from Washington Dulles including Ghana and Nigeria. We believe the strong local base of traffic in Washington, D.C., and the large demand from cities across the U.S. for travel to South Africa will help ensure the success of United's growth plans.

In total, United's proposal will connect 55 U.S. cities to Cape Town facilitating tourism, business, and government related travel. My community of Charlottesville, Virginia and the surrounding counties stands to benefit from this proposal, and I urge you to select United.

Sincerely,

Melinda C. Crawford, A.A.E.  
Chief Executive Officer  
Charlottesville-Albemarle Airport (CHO)  
(o) 434-973-8342 x 104  
100 Bowen Loop, Suite 200  
Charlottesville, VA 22911



CITY OF CHICAGO



CHICAGO DEPARTMENT OF AVIATION

May 24, 2022

The Honorable Peter Buttigieg  
Secretary  
United States Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

Re: Docket DOT-OST-2022-0050

Dear Secretary Buttigieg,

I write today in strong support for United Airlines' application to the U.S. Department of Transportation to launch nonstop service between Washington, D.C. and Cape Town, South Africa. Today, Chicago has single connect service to Cape Town three times per week via United's Newark – Cape Town operation. United's proposal in this proceeding to add service between Washington Dulles and Cape Town on three different days of the week will give travelers in Chicago a total of six days per week to fly United to/from Cape Town. This means consumers in the Chicago area will have more United flights to choose from, more itinerary options, more pricing options, and the ability to tailor their travels to/from Cape Town via two different United gateways.

United is a relatively new entrant in the U.S. – South Africa market and we support its plan to increase direct flights to this part of the world. Chicago has proven that our community can support direct service to Africa and, after establishing service from new East Coast gateways such as Washington D.C., we hope that United will consider adding nonstop U.S. – South Africa service from Chicago.

In total, United's proposal will connect 55 U.S. cities to Cape Town facilitating tourism, business, and government-related travel. Chicago, like many other communities stands to benefit from this proposal, and we recommend United without reservation.

Sincerely,

Andrew Velasquez III  
First Deputy Commissioner



HUNTSVILLE INTERNATIONAL AIRPORT • INTERNATIONAL INTERMODAL CENTER • JETPLEX INDUSTRIAL PARK

May 23, 2022

**BOARD OF DIRECTORS**

*Chairman*  
Mark McDaniel

*Vice Chairman*  
Philip W. (Trey) Bentley, III

*Secretary / Treasurer*  
Joey Ceci

*Vice Secretary*  
LaFreeda Jordan

Carl J. Gessler, Jr., M.D.

**EXECUTIVE STAFF**

*Chief Executive Officer*  
Richard Tucker

*Chief Operating Officer*  
Luther Roberts, A.A.E., CMA

*Chief Financial Officer*  
Robert M. Pro, CPA

*Director - Business Development*  
Barbie Peek

*General Counsel*  
Amy Nation

The Honorable Peter Buttigieg  
Secretary  
United States Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

Re: Docket DOT-OST-2022-0050

Dear Secretary Buttigieg,

I write today in strong support for United Airlines' application to the U.S. Department of Transportation to launch nonstop service between Washington, D.C. and Cape Town, South Africa. Today, my community has single connect service to Cape Town three times per week via United's Newark – Cape Town operation. United's proposal in this proceeding to add service between Washington Dulles and Cape Town on three different days of the week will give travelers in my city a total of six days per week to fly United to/from Cape Town. This means consumers in my area will have more United flights to choose from, more itinerary options, more pricing options, and the ability to tailor their travels to/from Cape Town via two different United gateways.

United is a relatively new entrant in the U.S. – South Africa market and we support its plan to increase flights to this part of the world. United has been successful at operating to other points in Africa from Washington Dulles including Ghana and Nigeria. We believe the strong local base of traffic in Washington, D.C., and the large demand from cities across the U.S. for travel to South Africa will help ensure the success of United's growth plans.

In total, United's proposal will connect 55 U.S. cities to Cape Town facilitating tourism, business, and government related travel. My community, Huntsville, Alabama, stands to benefit from this proposal and I urge you to select United.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Tucker". The signature is fluid and cursive, with the first name "Richard" being more prominent than the last name "Tucker".

Richard Tucker  
CEO

**HUNTSVILLE-MADISON COUNTY AIRPORT AUTHORITY**

1000 Glenn Hearn Blvd. / Box 20008 / Huntsville, AL 35824 / Tel: 256.772.9395 / Web: [www.portofhuntsville.com](http://www.portofhuntsville.com)



May 18, 2022

The Honorable Peter Buttigieg  
Secretary  
United States Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

RE: DOCKET DOT-OST-2022-0050

Dear Secretary Buttigieg:

I write today in strong support for United Airlines' application to the U.S. Department of Transportation to launch nonstop service between Washington, D.C. and Cape Town, South Africa.

United's proposal in this proceeding to add service between Washington Dulles and Cape Town will add new travel options for business and leisure travelers flying to and from my city of Knoxville, Tennessee, and the surrounding region. This means consumers in my area will have more flights to choose from, more itinerary options, more pricing options, and the ability to tailor their travels to/from Cape Town.

McGhee Tyson Airport here in Knoxville serves a vibrant air travel community including the Department of Energy's Oak Ridge National Laboratory, a global leader in research and development in a variety of fields. The addition of new flight options to and from Cape Town will be a great positive for our region.

United is a relatively new entrant in the U.S.-South Africa market, and we support its plan to increase flights to this part of the world. United has been successful at operating to other points in Africa from Washington Dulles including Ghana and Nigeria. We believe the strong local base of traffic in Washington, D.C., and the large demand from cities across the U.S. for travel to South Africa will help ensure the success of United's growth plans.

In total, United's proposal will connect 55 U.S. cities to Cape Town facilitating tourism, business, and government related travel. Knoxville and East Tennessee stand to benefit from this proposal, and I urge you to select United.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick W. Wilson".

Patrick W. Wilson, A.A.E.  
President

thb



LOUISVILLE  
REGIONAL AIRPORT AUTHORITY

(502) 368-6524  
flyLouisville.com

May 4, 2022  
The Honorable Peter Buttigieg  
Secretary  
United States Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

Re: Docket DOT-OST-2022-0050

Dear Secretary Buttigieg:

I write today in strong support for United Airlines' application to the U.S. Department of Transportation to launch nonstop service between Washington, D.C. and Cape Town, South Africa. Today, my community has single connect service to Cape Town three times per week via United's Newark - Cape Town operation. United's proposal in this proceeding to add service between Washington Dulles and Cape Town on three different days of the week will give travelers in my city a total of six days per week to fly United to/from Cape Town. This means consumers in my area will have more United flights to choose from, more itinerary options, more pricing options, and the ability to tailor their travels to/from Cape Town via two different United gateways.

United is a relatively new entrant in the U.S. - South Africa market and we support its plan to increase flights to this part of the world. United has been successful at operating to other points in Africa from Washington Dulles including Ghana and Nigeria. We believe the strong local base of traffic in Washington, D.C., and the large demand from cities across the U.S. for travel to South Africa will help ensure the success of United's growth plans.

In total, United's proposal will connect 55 U.S. cities to Cape Town facilitating tourism, business, and government related travel. My community, Louisville, KY, stands to benefit from this proposal and I urge you to select United.

Sincerely,

A handwritten signature in blue ink that reads 'Dan Mann'.

Dan E. Mann, A.A.E.  
Executive Director





ALLEGHENY COUNTY AIRPORT AUTHORITY  
PITTSBURGH INTERNATIONAL AIRPORT  
ALLEGHENY COUNTY AIRPORT

May 20, 2022

The Honorable Peter Buttigieg  
Secretary  
United States Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

Re: Docket DOT-OST-2022-0050

Dear Secretary Buttigieg,

On behalf of Pittsburgh International Airport, we appreciate the opportunity to provide input on the Department of Transportation's frequency allocation to Cape Town, South Africa. We also thank the Department for its work to ensure U.S. carriers have competitive access to key markets like Cape Town.

I write today in support of United Airlines' application to the U.S. Department of Transportation to launch nonstop service between Washington, D.C., and Cape Town, South Africa. Today, my community has single connect service to Cape Town three times per week via United's Newark-Cape Town operation. United's proposal in this proceeding to add service between Washington Dulles and Cape Town on three different days of the week will give travelers in the Pittsburgh region a total of six days per week to fly United to/from Cape Town. This means consumers will have more United flights to choose from, more itinerary options, more pricing options, and the ability to tailor their travels to and from Cape Town via two different United gateways.

United is a relatively new entrant in the U.S.-South Africa market and we support its plan to increase flights to this part of the world. United has been successful at operating to other points in Africa from Washington Dulles, including Ghana and Nigeria. We believe the local base of traffic in Washington, D.C., and the large demand from cities across the U.S. for travel to South Africa will help ensure the success of United's growth plans.

In total, United's proposal will connect 55 U.S. cities to Cape Town, facilitating tourism, business, and government-related travel. Pittsburgh International Airport stands to benefit from the enhanced choice and convenience offered by United's proposal, which will help support American businesses and grow the U.S. economy.

Sincerely,

Christina A. Cassotis  
Chief Executive Officer

Pittsburgh International Airport  
Landside Terminal, 4th Floor Mezz.  
PO Box 12370 | Pittsburgh, PA 15231-0370  
(412) 472-3500 | FLYPITTSBURGH.COM

## ROANOKE REGIONAL AIRPORT COMMISSION

Roanoke-Blacksburg Regional Airport  
5202 Aviation Drive  
Roanoke, VA 24012-1148  
(540) 362-1999  
FAX (540) 563-4838  
www.flyroa.com



May 23, 2022

The Honorable Peter Buttigieg  
Secretary  
United States Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

Re: Docket DOT-OST-2022-0050

Dear Secretary Buttigieg,

I write today in strong support for United Airlines' application to the U.S. Department of Transportation to launch nonstop service between Washington Dulles International Airport and Cape Town, South Africa. Today, the Southwest Virginia community served by Roanoke-Blacksburg Regional Airport has make two to four connecting flights to reach Cape Town, regardless of their airline of choice.

United's proposal in this proceeding to add service between Washington Dulles and Cape Town on three different days of the week will give travelers in my region a new opportunity to fly United to/from Cape Town with a single connection over Washington Dulles. While United is a relatively new entrant in the U.S. – South Africa market, we support its plan to increase flights to this part of the world.

United has been successful at connecting our nations capital and Southwest Virginia to the global marketplace, including flights to other points in Africa from Washington Dulles including Ghana and Nigeria. We believe the strong local base of traffic in Washington, D.C., and the large demand from smaller cities such as Roanoke across the U.S. for travel to South Africa will help ensure the success of United's growth plans.

In total, United's proposal will connect 55 U.S. cities to Cape Town facilitating tourism, business, and government related travel. Roanoke and Southwest Virginia stand to benefit from this proposal and I urge you to select United.

Sincerely,

Mike Stewart  
Executive Director



San Francisco International Airport

May 25, 2022

The Honorable Peter Buttigieg  
Secretary  
UNITED STATES DEPARTMENT OF TRANSPORTATION  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

Re: Docket DOT-OST-2022-0050

Dear Secretary Buttigieg:

On behalf of San Francisco International Airport (SFO), I write in strong support of United Airlines, Inc.'s (United) application to the U.S. Department of Transportation to launch nonstop service between Washington, D.C. and Cape Town, South Africa. Today, SFO and the San Francisco Bay Area community have a single connect service to Cape Town three times per week via United's Newark – Cape Town operation. United's proposal in this proceeding to add service between Washington Dulles and Cape Town on three different days of the week will give passengers in the San Francisco Bay area a total of six days per week to fly United to/from Cape Town. As a result, Bay Area consumers will have more United flights to choose from, more itinerary options, more pricing options, and the ability to tailor their travels to/from Cape Town via two different United East Coast gateways.

United is a relatively new entrant in the U.S. – South Africa market and we support its plan to increase flights to this part of the world. United has been successful at operating to other points in Africa from Washington Dulles including Ghana and Nigeria. We believe the strong local base of traffic in Washington, D.C., and the large demand from cities across the U.S. for travel to South Africa will help ensure the success of United's growth plans.

In total, United's proposal will connect 55 U.S. cities to Cape Town facilitating tourism, business, and government-related travel. SFO and San Francisco Bay Area passengers will benefit from this proposal, and I urge you to support United's application to expand this service.

Thank you for your time and consideration.

Very truly yours,

A handwritten signature in black ink, appearing to read "Ivar C. Satero", is written over a circular stamp. The signature is fluid and cursive. Below the signature, the name "Ivar C. Satero" and the title "Airport Director" are printed in a standard black font.

Ivar C. Satero  
Airport Director

**AIRPORT COMMISSION** CITY AND COUNTY OF SAN FRANCISCO

LONDON N. BREED  
MAYOR

ELEANOR JOHNS  
PRESIDENT

MALCOLM YEUNG  
VICE PRESIDENT

EVERETT A. HEWLETT, JR.

JANE NATOLI

JOSE F. ALMANZA

IVAR C. SATERO  
AIRPORT DIRECTOR



May 16, 2022

The Honorable Peter Buttigieg  
Secretary  
United States Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

Re: Docket DOT-OST-2022-0050

Dear Secretary Buttigieg:

I write today in strong support for United Airlines' application to the U.S. Department of Transportation to launch nonstop service between Washington, D.C. and Cape Town, South Africa.

Today, my community has single connect service to Cape Town three times per week via United's Newark – Cape Town operation. United's proposal in this proceeding to add service between Washington Dulles and Cape Town on three different days of the week will give travelers in my city a total of six days per week to fly United to/from Cape Town. This means consumers in my area will have more United flights to choose from, more itinerary options, more pricing options, and the ability to tailor their travels to/from Cape Town via two different United gateways.

United is a relatively new entrant in the U.S. – South Africa market and we support its plan to increase flights to this part of the world. United has been successful at operating to other points in Africa from Washington Dulles including Ghana and Nigeria. We believe the strong local base of traffic in Washington, D.C., and the large demand from cities across the U.S. for travel to South Africa will help ensure the success of United's growth plans.

In total, United's proposal will connect 55 U.S. cities to Cape Town facilitating tourism, business, and government related travel. My community, in Syracuse and the surrounding the Central NY region, stands to benefit from this proposal and I urge you to select United.

Sincerely,



H. Jason Terreri, IAP, A.A.E.  
Executive Director



Syracuse Regional Airport Authority

p – 315.454.3263  
f – 315.454.8757  
info@syrairport.org

1000 Col. Eileen Collins Blvd.  
Syracuse, NY 13212



May 19, 2022

The Honorable Peter Buttigieg  
Secretary, United States Department of Transportation  
1200 New Jersey Avenue, S.E. Washington, D.C. 20590

Re: Docket DOT-OST-2022-0050

Dear Secretary Buttigieg,

We write today in strong support for United Airlines' application to the U.S. Department of Transportation (Department) to launch the first-ever U.S. carrier nonstop service between Washington, D.C. and Cape Town, South Africa. United proposes to connect the legislative capitals of each country with three weekly flights, providing important government, business, and cultural travel ties that no other proposal in this proceeding can match.

While your Department reviews proposals for the remaining South Africa frequencies, I urge you to consider the various groups of travelers, communities, businesses, and government bodies that stand to benefit most. In this regard, I have no doubt that the public benefits of Washington, D.C., and the connections to other cities across the U.S. that the Dulles hub offers, far surpass what Atlanta (as proposed by Delta) can offer across these same metrics. For consideration:

- **Market Demand:** As measured by annual bookings, the Washington, D.C. - Cape Town route is the largest route between the U.S. and Cape Town that does not currently have nonstop service and is more than double the size of the Atlanta - Cape Town route
- **Strong Local Community Ties:** The Washington, D.C./Virginia/Maryland region has strong cultural ties to South Africa with a South African foreign-born population that ranks in the U.S. top five and is larger than Atlanta
- **Market Size and Community Access:** United's flights between Dulles and Cape Town will connect 55 cities across the United States to Cape Town, which represent over 155,000 annual bookings and 92% of the entire U.S. travel demand to Cape Town
- **Increased Capacity and More Choice:** Because United currently operates between Newark/New York City and Cape Town on different days of the week than the Washington, D.C. - Cape Town flights would operate, flights from Washington, D.C. will provide the country nearly daily service to Cape Town offered online by a single carrier – United – which means more day-of-week flight choices, more itinerary choices, more pricing choices, and more product choices by United for consumers
- **Broader Reach:** United partners with an airline that has a hub operation at Cape Town, therefore United customers will be able to connect at Cape Town to other points in South Africa and to other countries in the southern region of the African continent.

Based upon the many benefits of a flight from Washington, D.C. to Cape Town, we fully support this proposal by United Airlines.

Sincerely,

Kamil Olufowobi  
President & CEO, Most Influential People of African Descent (MIPAD)

**MOST INFLUENTIAL PEOPLE OF AFRICAN DESCENT (MIPAD)**

**VISION** - A World Driven By EXCELLENCE

**MISSION** - Identify • Connect • Develop

**CONTACT** – [info@mipad.org](mailto:info@mipad.org) | +1 917 541 8394

**ATTACHMENT 3**

# Confronting the Climate Crisis: United's Strategy

United's strengthened climate commitments reflect the increasing urgency of the crisis. In 2020, we established an industry-leading target – to go 100% green by 2050 and achieve net zero GHG emissions without relying on traditional carbon offsets. As the only airline that has committed to reduce 100% of our greenhouse gas emissions without relying on traditional carbon offsets, we are investing in the solutions that can actually reduce, and ultimately remove, the emissions from flying. At United, we believe that it is not acceptable to declare success by simply

purchasing carbon credits while enabling the status quo within our industry.

In 2021, we established a strong mid-term goal of reducing our carbon intensity 50% compared to 2019 by the year 2035. We recognize the need to demonstrate mid-term progress en-route to our ultimate goal of net-zero by 2050. Our 2035 carbon intensity goal is based in science, aligns with the goals of the Paris Agreement, and demonstrates clear progress towards our 2050 net-zero GHG emissions goal.

**United is investing in solutions that reduce our environmental impact in the air, on the ground and at our facilities, which will benefit our customers, stockholders, employees, and the communities we serve. Our strategy to achieve our climate goals is centered around four key pathways:**

- 1. Reducing** United's environmental footprint;
- 2. Innovating** for potentially transformative carbon reduction technology;
- 3. Removing** carbon emissions in the atmosphere; and
- 4. Collaborating** with employees, customers, airports, suppliers, cross-industry partners, and policymakers to facilitate faster action and the commercialization of technology solutions concerning climate change.

## Reducing United's Environmental Footprint.

Today, nearly all (98%) of United's GHG emissions are from the combustion of fossil jet fuel. Reducing our consumption of conventional jet fuel by maximizing our fuel efficiency and working to replace the conventional fossil fuel we use with lower carbon alternative fuel is the nearest-term and fastest mechanism for United to reduce its emissions. Sustainable aviation fuel ("SAF") is an alternative fuel derived from renewable or waste products that can reduce lifecycle GHG emissions upwards of 85% compared to conventional fossil fuel. In addition, SAF is 'drop-in' ready, meaning it is interchangeable with conventional jet fuel and requires no modifications to our aircraft engines or airframes. This also makes it compatible with the existing fuel distribution and storage infrastructure at airports. United has long been championing the development, deployment, and commercialization of SAF. United alone

has nearly twice the publicly announced SAF purchase commitments as all other airlines combined globally<sup>2</sup>, although SAF comes with a price premium and its supply in the jet fuel market is currently constrained (contributing to less than 1% of global commercial aviation fuel usage). Some of our SAF accomplishments include:

- **In 2015, United made a \$30 million equity investment in Fulcrum BioEnergy, Inc.** ("Fulcrum"), a company that has developed a process for transforming municipal solid waste into low carbon transportation fuels and entered into a long-term supply agreement with Fulcrum which provides United with the opportunity to purchase up to 900 million gallons of SAF.
- **In 2016, United became the first airline globally to use SAF in regular operations on a continuous basis.** To date, we've used more than 5 million gallons at Los Angeles International Airport.
- **In 2021, United launched its first-of-its-kind Eco-Skies Alliance program** with two separate enrollments in which corporate partners agreed to collectively fund the price premium for approximately 7.1 million gallons of SAF.
- **In September 2021, United made a joint investment with Honeywell UOP in Alder Fuels**, a new clean tech venture developing a first-of-its-kind low-carbon crude technology to accelerate large-scale SAF production. United also agreed to purchase 1.5 billion gallons (enough to fly more than 57 million passengers) of SAF from Alder Fuels.
- **In December 2021, United made aviation history by operating the first passenger flight using 100% SAF**, in one engine, from Chicago to Washington, D.C. The flight showcased the safety of SAF and the potential for a dramatically reduced carbon footprint for aviation.

Alongside developing and using SAF, United is concentrated on introducing newer, more fuel-efficient aircraft into its fleet as well as improving the efficiency of its existing fleet. From 1990 to 2021, United improved its mainline fuel efficiency more than 30%. In the second quarter of 2021, United announced United Next and entered into firm narrow-body aircraft orders for 200 Boeing 737 MAX aircraft and 70 Airbus A321neo aircraft, which are expected to have an 11% overall improvement in fuel efficiency and 17-20% lower carbon emission per seat compared to older planes. In conjunction with its SAF mission and improving the fuel efficiency of its fleet, United has been revamping its flight and ground operations, implementing operational and procedural initiatives to drive fuel conservation. Over 4,000 units of United's ground service equipment ("GSE") around the world are electric or use alternative fuels and, as of the end of 2021, nearly 32% of its GSE

## United's SAF accomplishments

# 30%

From 1990 to 2021, United improved its mainline fuel efficiency more than 30%

# 1.5B

United agreed to purchase 1.5 billion gallons of SAF from Alder Fuels in 2021

# 200

Aircraft orders for 200 Boeing 737 MAX which are expected to have an 11% overall improvement in fuel efficiency

# 4,000

Over 4,000 units of United's ground service equipment ("GSE") around the world are electric or use alternative fuels

<sup>2</sup> As of year-end 2021

fleet have been electrified. United has worked collaboratively across its organization and with Air Traffic Control providers to improve fuel efficiency through the implementation of best practices, by providing training to its pilots and dispatchers and supplying them with the tools needed to execute on those strategies.

### Innovating in Carbon Reduction Technology.

United has been forming partnerships with, as well as investing in, early-stage climate technology companies that have the potential to scale and support United's climate targets or are generally supportive of advancing sustainability within the broader economy. In June 2021, United launched a new corporate venture capital fund, United Airlines Ventures, Ltd. ("UAV"), to focus our efforts on these investments.



- **In February 2021, United announced an investment in, and agreement to work with, Archer Aviation to accelerate the development and production of their electric aircraft** – an urban mobility solution that has the potential to serve as an “air taxi,” giving United an opportunity to accelerate the development of clean technologies on a broader scale and its customers another opportunity to reduce their carbon footprint before they even board a United flight.



- **In July 2021, UAV announced that, along with Breakthrough Energy Ventures and Mesa [Airlines], it invested in electric aircraft startup Heart Aerospace Incorporated.** Heart Aerospace is developing the ES-19, a 19-seat electric aircraft that has the potential to fly customers up to 250 miles with zero emissions when powered by renewable electricity.



- **In December 2021, United became the largest airline to invest in zero-emission engines for regional aircraft with a new equity stake in hydrogen-electric engine developer, ZeroAvia, Inc.** These engines support the retrofit of select narrow body engines, replacing fossil fuel burning engines with zero-emission alternatives.

### Removing Carbon Emissions in the Atmosphere.

To achieve net zero by 2050, we believe aviation and beyond will rely on carbon removal technologies. Our climate strategy extends beyond reducing our emissions by also focusing on atmospheric carbon removal and utilization. We are investing in carbon capture technologies to sequester carbon and to potentially utilize and recycle captured carbon to make low-carbon fuels.

---

**In 2020, United became the first airline to announce a commitment to invest in direct air capture, a carbon capture and sequestration technology.**

## Climate Leadership and Coalition Building.

Scaling the technologies that can decarbonize aviation requires thoughtful and action-oriented collaboration with employees, customers, airports, suppliers, cross-industry partners and policymakers. Through partnership, we believe we can accelerate commercialization and scale to achieve our 2050 net zero ambition.

- **United worked with federal policymakers** and a broad multi-industry coalition to champion the Sustainable Skies Act SAF Blender's Tax Credit with the intent to create an economic incentive for increased SAF production within the United States.
- **United is a founding member of the Biden Administration's First Movers Coalition**, a collective of leading companies committing to purchasing low-carbon technologies in hard-to-abate sectors. As part of its membership, United has committed to using emerging technologies with significant emissions reductions by 2030 and has also set a target of replacing at least 5% of conventional jet fuel demand with SAF that reduces lifecycle GHG emissions by 85% or more compared with conventional jet fuel by 2030.
- **In order to broaden the base of support for climate action across partisan lines and industry boundaries, in February 2021, United became a founding member of the Bipartisan Policy Center's Net zero Business Alliance** where our CEO is working with key corporate leaders from the power, forestry, energy, and food sectors to make the case for urgent climate action to leaders from diverse partisan and ideological backgrounds.
- **At the international level, United was the only airline whose chief executive officer attended the 2021 UN Conference of the Parties ("COP26") climate conference**, supporting the pathway to net zero emissions for air travel through the use of SAF and other technologies.
- **During the COP26 conference, the Sustainable Aviation Buyers Alliance ("SABA"), a non-profit initiative of the Environmental Defense Fund and Rocky Mountain Institute that is developing a sustainability framework for SAF**, announced that United and other airlines have founded its new Aviators Group. Through SABA, United intends to work collaboratively with its customers and industry peers to support low-carbon technologies such as SAF.
- **United has supported the adoption of more aggressive industry targets**, with both Airlines for America ("A4A") and the International Air Transport Association committing to net zero emissions by 2050 for domestic and international carriers, respectively (see below for more information). In addition, United along with other A4A members have pledged to work towards the Biden Administration's SAF Grand Challenge to collectively make 3 billion gallons of SAF available domestically by 2030.

## **CERTIFICATE OF SERVICE**

I certify that I have this date served the foregoing document on the following persons by causing a copy to be sent electronically in accordance with the Department's Rules of Practice:

American

Robert Wirick

robert.wirick@aa.com

John Williams

john.b.williams@aa.com

Delta

Chris Walker

chris.walker@delta.com

Steve Seiden

steven.seiden@delta.com

Hawaiian

Parker Erkmann

perkmann@cooley.com

State/FAA/DOT

Richard Yoneoka

yoneokar@state.gov

Ricardo Domingo

rick.domingo@faa.gov

Todd Homan

todd.homan@dot.gov

Brett Kruger

brett.kruger@dot.gov

Robert Finamore

robert.finamore@dot.gov

Benjamin Taylor

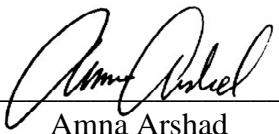
benjamin.taylor@dot.gov

Office of the Ambassador of  
South Africa in Washington,  
D.C.

Twala Makosazana

twalam@dirco.gov.za

info@airlineinfo.com

  
Amna Arshad

May 25, 2022